

JEFFREY LEWIS (SBN 66587)
 DARIN D. RANAHAN (SBN 273532)
 LEWIS, FEINBERG, LEE
 & JACKSON, P.C.
 476 9th Street
 Oakland, CA 94607
 Telephone: (510) 839-6824
 Facsimile: (510) 839-7839
 Email: jlewis@lewisfeinberg.com
 Email: tjackson@lewisfeinberg.com
 Email: dranahan@lewisfeinberg.com

Attorneys for Plaintiffs NICK CANCELLA,
 GREG JEWELL, DAVID BEAUSOLEIL,
 PATRICK SWEENEY, LUCIO FLORES,
 THOMAS JENNISON, MICHAEL
 EMANUEL, ROBERT BIRCH, KENNETH
 FORBES, BRIAN O'NEIL, FREDERICK
 SIMON,
 and all others similarly situated
 [additional counsel on following page]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO/OAKLAND DIVISION

NICK CANCELLA, GREG JEWELL, DAVID
 BEAUSOLEIL, PATRICK SWEENEY,
 LUCIO FLORES, THOMAS JENNISON,
 MICHAEL EMANUEL, ROBERT BIRCH,
 KENNETH FORBES, BRIAN O'NEIL, and
 FREDERICK SIMON, on behalf of themselves
 and all others similarly situated,

Plaintiffs,

v.

ECOLAB, INC., a corporation,

Defendant.

Case No. CV 12-03001 JD

**DECLARATION OF JEFFREY LEWIS
 IN SUPPORT OF MOTION FOR
 ATTORNEYS' FEES AND EXPENSES**

Date: December 9, 2015

Time: 10:00 a.m.

Ctrm.: 11

Judge: Hon. James Donato

Complaint Filed: June 11, 2012

Trial Date: August 19, 2015

1 JAMES M. FINBERG (SBN 114850)
EVE H. CERVANTEZ (SBN 164709)
2 CONNIE K. CHAN (SBN 284230)
ALTSHULER BERZON LLP
3 177 Post Street, Suite 300
San Francisco, CA 94108
4 Telephone: (415) 421-7151
Facsimile: (415) 362-8064
5 Email: jfinberg@altshulerberzon.com
Email: ecervantez@altshulerberzon.com
6 Email: cchan@altshulerberzon.com

7 ROBERT S. NELSON (SBN 220984)
NELSON LAW GROUP
8 26 West Portal Avenue, Suite 1
San Francisco, CA 94127
9 (415) 702-9869 (phone)
(415) 592-8671 (fax)
10 Email: rnelson@nelsonlawgroup.net

11 STEVEN G. ZIEFF (SBN: 84222)
DAVID A. LOWE (SBN: 178811)
12 JOHN T. MULLAN (SBN: 221149)
MICHELLE LEE (SBN 266167)
13 RUDY, EXELROD, ZIEFF & LOWE, L.L.P.
351 California Street, Suite 700
14 San Francisco, CA 94104
Telephone: (415) 434-9800
15 Facsimile: (415) 434-0513
Email: sgz@rezlaw.com
16 Email: dal@rezlaw.com
Email: jtm@rezlaw.com

17 MICHAEL J.D. SWEENEY (admitted pro hac vice)
18 GETMAN & SWEENEY, PLLC
9 Paradies Lane
19 New Paltz, NY 12561
Telephone: (845) 255-9370
20 Facsimile: (845) 255-8649
Email: msweeney@getmansweeney.com

21 JUSTIN M. SWARTZ (admitted pro hac vice)
22 MOLLY BROOKS (admitted pro hac vice)
OUTTEN & GOLDEN LLP
23 3 Park Avenue, 29th Floor
New York, NY 10016
24 Telephone: (212) 245-1000
Facsimile: (646) 509-2057
25 Email: jms@outtengolden.com
Email: mb@outtengolden.com
26
27
28

1 I, Jeffrey Lewis, hereby declare and state:

2 1. I am an attorney in good standing of the State Bar of California. I am a
3 shareholder at the law firm of Lewis, Feinberg, Lee & Jackson, P.C (“LFLJ”), which is counsel
4 for Plaintiffs and the proposed plaintiff classes together with the firms of Altshuler Berzon LLP;
5 Nelson Law Group; Rudy, Exelrod, Zieff & Lowe, LLP; Getman & Sweeney, PLLC; and Outten
6 & Golden LLP.

7 2. This declaration is submitted in support of Plaintiffs’ motion for attorneys’ fees
8 and expenses. If called and sworn as a witness, I would testify competently as to the facts in this
9 declaration. All the facts stated herein are true and correct within my personal knowledge.

10 **Experience of Counsel.**

11 3. LFLJ is a 13-attorney firm located in Oakland, California, with a nationwide
12 practice focused on plaintiffs’ public interest class action and complex litigation. The firm is a
13 nationally recognized leader in workers’ rights, civil rights, and employee benefits litigation.
14 LFLJ specializes in wage and hour class actions on behalf of employees in California and
15 nationally; anti-discrimination class actions on behalf of women, people of color, people with
16 disabilities, and individuals in other protected groups against employers who violate federal and
17 state laws; equal access class actions on behalf of people with disabilities who seek equal access
18 to public places of accommodation, such as restaurants, stores, and the internet; and employee
19 benefits class actions on behalf of workers and retirees. A copy of the firm’s curriculum vitae is
20 attached hereto as Exhibit A, and a representative list of the firm’s historical and current class
21 and other complex multi-plaintiff actions is attached hereto as Exhibit B.

22 4. I am a shareholder at LFLJ with responsibility for this case. I graduated from the
23 University of California, Berkeley School of Law (formerly Boalt Hall School of Law) in 1975.
24 I was admitted to practice in California in 1975. In addition to my California State Bar
25 membership, I am admitted to practice before the U.S. District Courts for the Northern District
26 of California, Eastern District of California, Central District of California, and Southern District
27 of California, as well as the Second, Third, Fourth, Ninth, and Tenth Circuit Courts of Appeals
28 and the U.S. Supreme Court. Exhibit A contains additional information about my qualifications.

1 5. Aside from my successful practice in litigating employment class actions, my
2 other activities and honors, more of which are described in Exhibit A, include the following: I
3 served a three-year term as Co-Chair of the Employee Benefits Committee of the American Bar
4 Association's Labor and Employment Section. I am one of the co-chairs of the Board of Senior
5 Editors of *Employee Benefits Law* (BNA). I also was selected as a member of the College of
6 Labor and Employment Lawyers, and I am a charter fellow of the American College of
7 Employee Benefits Counsel (ACEBC). I have served on the faculty of several law schools,
8 including presently at the University of California, Berkeley, School of Law, at which I have
9 taught courses in employee benefits law. I serve as a mediator for the U.S. District Court for the
10 Northern District of California and privately. I have been named a "Northern California Super
11 Lawyer" in the Employee Benefits category each year from 2005 to the present. Super Lawyers
12 magazine has named me a Top 100 Northern California Lawyer each year from 2011 to the
13 present.

14 6. Todd Jackson is a shareholder at LFLJ with responsibility for this case. Mr.
15 Jackson graduated from the University of California, Berkeley School of Law (formerly Boalt
16 Hall School of Law) in 1998. Mr. Jackson was admitted to practice in California in 1999. In
17 addition to his California State Bar membership, he is admitted to practice before the U.S.
18 District Courts for the Northern District of California, Eastern District of California, Central
19 District of California, and Southern District of California, as well as the Ninth Circuit Court of
20 Appeals. Exhibit A contains additional information about Mr. Jackson's qualifications.

21 7. Aside from his practice litigating employment class actions, Mr. Jackson's other
22 activities and honors, more of which are described in Exhibit A, include the following: Mr.
23 Jackson serves as the Employee Co-Chair of the Employee Benefits Committee of the ABA's
24 Labor and Employment Section. Mr. Jackson is a chapter editor of the ABA's "The Fair Labor
25 Standards Act" and of the ABA's "Employee Benefits Law," and has presented numerous
26 articles on wage and hour litigation and ERISA fiduciary rules. He is also the author of
27 "Mediating Wage and Hour Disputes" in the California Continuing Education of the Bar's
28 *California Wage and Hour - Law and Litigation*. He is a frequent speaker and writer on wage

1 and hour and ERISA issues. He has been named a Northern California Super Lawyer every year
2 from 2009 to the present.

3 8. Andrew Lah was an associate at LFLJ with responsibility for this case. Mr. Lah is
4 a graduate of Cornell University (1998) and UCLA School of Law (2004), where he was an
5 Articles Editor for the Asian Pacific American Law Journal. Mr. Lah was a Trial Attorney with
6 the Federal Public Defenders Office in San Diego (2004-09) before joining the firm.

7 9. Darin Ranahan is an associate at LFLJ with responsibility for this case. He is a
8 fifth-year associate, having graduated from the University of California, Berkeley School of Law
9 in 2010, where he was the Co-Editor-in-Chief of the Berkeley Journal of Employment and Labor
10 Law and a clinical volunteer with the Legal Aid Society—Employment Law Center’s Workers’
11 Rights Clinic. He also worked as a law clerk for the Legal Aid Society—Employment Law
12 Center and LFLJ. He was admitted to the State Bar of California in 2010. From 2010 to 2012, he
13 worked as an associate attorney at Siegel & LeWitter (later, Siegel, LeWitter & Malkani), where
14 he exclusively handled wrongful termination and wage-and-hour matters. From 2012 to 2013, he
15 served as a clerk for the Honorable Edward M. Chen of the United States District Court for the
16 Northern District of California. He is admitted to practice law before the Courts of the State of
17 California, the United States District Courts for the Northern and Eastern Districts of California
18 and the United States Court of Appeals for the Ninth Circuit. He has been an attorney at LFLJ
19 since 2013. At LFLJ, his practice focuses on public interest litigation, particularly the
20 enforcement of state and federal employment rights. Aside from his litigation practice, he is a
21 contributing author to *ERISA Litigation* (BNA) and a volunteer attorney with the Legal Aid
22 Society—Employment Law Center’s and Centro Legal de la Raza’s Workers’ Rights Clinics.

23 **LFLJ’s Attorneys’ Fee Lodestar**

24 10. Along with our co-counsel Altshuler Berzon LLP; Rudy, Exelrod, Zieff & Lowe,
25 LLP; Nelson Law Group; Outten & Golden LLP; and Getman & Sweeney, PLLC, my colleagues
26 and I have efficiently prosecuted this case since filing the lawsuit in June 2012, devoting
27 substantial time and out-of-pocket costs to this prosecution. We have not been paid for the time
28 spent on this litigation and undertook substantial risk that we would not be paid in pursuing this

1 litigation, which we pursued to the exclusion of other potentially more lucrative work.

2 11. The specific work performed by my firm and co-counsel in prosecuting this action
3 has included, but not been limited to, the following tasks: (1) conducting pre-filing investigation,
4 both legal and factual; (2) drafting the complaint; (3) conducting informal ongoing investigation,
5 including interviewing nearly 300 FLSA Collective Action Opt-Ins; (4) propounding and
6 responding to extensive written discovery, including requests for production of documents,
7 interrogatories, and requests for admissions; (5) deposing five of Defendant's Rule 30(b)(6)
8 witnesses (two of whom were deposed twice); (6) reviewing voluminous amounts of
9 documentary and electronic data produced in discovery; (7) preparing a motion for Rule 23 class
10 certification of eight State Law Classes; (8) preparing and successfully arguing a motion for
11 conditional certification of Plaintiffs' FLSA claims as a collective action, *Hoffmann-La Roche*
12 notice, and equitable tolling; (9) preparing an opposition to Ecolab's motion to decertify the
13 FLSA collective action; (10) preparing multiple motions for leave to file late Opt-In forms; (11)
14 investigating and preparing multiple amended complaints and motions for leave to file amended
15 complaints; (12) preparing a motion for partial summary adjudication on Ecolab's FLSA § 7(i)
16 exemption defense, successfully opposing Ecolab's cross-motion for summary judgment on the
17 same defense, and preparing an opposition to Ecolab's second motion for summary judgment;
18 (13) preparing for and participating in settlement negotiations; (14) drafting and negotiating the
19 Settlement Agreement and preparing the settlement approval papers, including the motion for
20 preliminary approval; (15) working with experts; (16) preparing for and defending the
21 depositions of all Named Plaintiffs and 20 FLSA Opt-Ins; (17) working with the Hoffmann-La
22 Roche notice administrator and the settlement administrator; (18) case management, including
23 preparing for case management conferences and drafting case management statements; and (19)
24 preparing a motion to transfer venue.

25 12. LFLJ maintains contemporaneous billing records for all of its cases. In particular,
26 it has used a program called Timesolv for the duration of this litigation to record billable time.
27 To calculate my firm's lodestar for this case, I reviewed these records and exercised billing
28 judgment in eliminating time entries that may have been duplicative or inefficient. For example,

I deleted the time of all LFLJ employees who billed fewer than six hours on this case. Based on my review of these records after completion of such billing judgment, as of August 20, 2015, the total lodestar for LFLJ's fees in this case is \$178,172.50.

13. This lodestar is based on the following amounts of time expended by LFLJ attorneys and staff: 50.8 hours for Mr. Lewis, 21.5 hours for Mr. Lah, 9.6 hours for Mr. Jackson, 166 hours for LFLJ law clerks and paralegals, and 218.9 hours for myself. All of these hours were necessary for the diligent prosecution of Plaintiffs' claims. These billing entries are reflected in the attached Exhibit C. Notably, these entries do not include the time expended on Plaintiffs' motions for final settlement approval, for attorneys' fees and expenses, and for class representative service awards, or any additional work required in oversight of the settlement distribution process. LFLJ's lodestar is based on hourly rates of \$900 for Mr. Lewis, \$700 for Mr. Jackson, \$475 for Mr. Lah, and \$350 for myself, as well as law clerk and paralegal hourly rates ranging from \$200 to \$275 per hour. These hourly rates are fair and in line with comparable firms, and are the same rates charged to paying, hourly clients.

14. Moreover, similar rates have been approved in other cases involving LFLJ. *See, e.g. Vallabhapurapu v. Burger King Corp.*, No. C 11-00667 WHA, 2012 WL 5349389, at *4 (N.D. Cal. Oct. 29, 2012) (approving 2012 fee structure rates of \$450 for Mr. Lah, \$825 for a LFLJ shareholder, and \$335 for a third-year associate, as well as \$225 to \$275 for paralegals and law clerks); *Holloway v. Best Buy Co.*, No. 05-5056 PJH (N.D. Cal. Nov. 9, 2011) (approving hourly rates of \$825 for a LFLJ shareholder, \$365 for a sixth-year associate, \$340 for a fifth-year associate, \$210 for law student clerks, and \$190 for paralegals). Given the time since those cases, the rates requested herein are reasonable.

15. Applying LFLJ's current hourly rates to the hours spent on this case, as reduced in the exercise of billing judgment, yields the following lodestar:

First Name	Last Name	Position	Time	Rate	Value
Jeffrey	Lewis	Shareholder & Attorney	50.80	\$900.00	\$45,720.00
Todd	Jackson	Shareholder & Attorney	9.60	\$700.00	\$6,720.00

First Name	Last Name	Position	Time	Rate	Value
Andrew	Lah	Associate Attorney	21.50	\$475.00	\$10,212.50
Darin	Ranahan	Associate Attorney	218.90	\$350.00	\$76,615.00
Amanda	Karl	Law Clerk	6.00	\$275.00	\$1,650.00
John	Tremblay	Law Clerk	35.20	\$275.00	\$9,680.00
Jeffrey	Lais	Paralegal	1.80	\$250.00	\$450.00
Elizabeth	Keenley	Paralegal	6.30	\$225.00	\$1,417.50
Eric	Garcia	Paralegal	94.70	\$225.00	\$21,307.50
Colin	Caprara	Paralegal	22.00	\$200.00	\$4,400.00
TOTAL			466.80		\$178,172.50

16. The following chart reflects a summary of LFLJ's lodestar by task, as itemized in paragraph 11 above:

Category	Description	Actual Time	Actual Value
1	Pre-filing Investigation	0.00	\$0.00
2	Complaint	0.00	\$0.00
3	Ongoing Information Investigation	109.30	\$24,960.00
4	Written Discovery	40.65	\$14,502.50
5	Depositions of Defendant	8.50	\$4,272.50
6	Document Review	14.40	\$6,280.00
7	Motion for Rule 23 Class Certification	21.10	\$10,352.50
8	Motions re FLSA Collective Action	1.50	\$1,130.00
9	Amended Complaints and Related Motions	43.60	\$14,650.00
10	Motions for Summary Judgment	36.25	\$14,472.50
11	Settlement Negotiations	49.90	\$24,670.00
12	Settlement Approval Papers	8.30	\$6,810.00
13	Working with Experts	29.70	\$10,670.00
14	Defending Depositions	61.00	\$20,895.00
15	Settlement Administration	0.00	\$0.00
16	Case Management	38.70	\$22,520.00

Category	Description	Actual Time	Actual Value
17	Motion to Transfer Venue	3.90	\$1,987.50
TOTAL		466.80	\$178,172.50

LFLJ's Expenses

17. Each of the six firms appointed as Class Counsel in this case contributed to a Joint Cost Fund, from which various litigation expenses were paid. Altshuler Berzon maintained complete and accurate records of all expenditures from the Joint Cost Fund, which are summarized in the Declaration of James M. Finberg in Support of Plaintiffs' Motion for Attorneys' Fees and Expenses filed concurrently with this declaration.

18. In addition to the litigation expenses paid out of the Joint Cost Fund, LFLJ incurred costs of \$4754.56, based on the following categorical breakdown:

Category	Total
Airfare Total	\$510.20
Copies & Prints Total (6,840 copies at \$0.20 per page)	\$1,368.00
Hotel & Meals Total	\$537.36
Online Legal Research	\$1,730.74
Overnight Delivery	\$395.93
Postage	\$75.80
Travel Expense	\$136.53
TOTAL	\$4,754.56

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of October 2015, in Oakland, California.


 Jeffrey Lewis

EXHIBIT A

EXHIBIT A

LEWIS, FEINBERG, LEE & JACKSON, P.C. CURRICULUM VITAE

Lewis, Feinberg, Lee & Jackson, P.C. (formerly Lewis, Feinberg, Lee, Renaker & Jackson, P.C.) is a national firm that represents plaintiffs in ERISA pension and employee benefit cases, overtime pay and other wage and hour cases, and employment discrimination and civil rights cases. The thirteen-attorney firm is engaged in litigation and consulting work on behalf of individuals, plans, unions, nonprofit organizations, law firms, and other groups.

Wage and Hour Practice

The firm handles all types of wage and hour litigation, both in California and throughout the United States. These cases include claims for overtime pay arising from an employer's decision to improperly classify groups of salaried employees (such as computer workers or insurance claims representatives) as exempt from state and federal overtime laws, claims for overtime pay and straight pay where hourly employees are required to perform work "off-the-clock" either before or after the work day, and claims for lunch or rest break pay for California employees. The firm has been involved in groundbreaking litigation that has restored over a hundred million dollars in lost overtime wages to employees who have been misclassified or worked off the clock, including recovering wages for chicken processing workers, construction laborers, office workers, and computer technical workers at IBM and Computer Sciences Corporation. The firm is currently representing classes and proposed classes of computer workers, pest extermination workers, caregivers, janitors, and salespeople. **Todd Jackson** and **Catha Worthman** are responsible for much of the firm's wage and hour practice, and **Daniel Feinberg** and **Lindsay Nako** are active in the vacation pay and off-the-clock areas.

ERISA and Employee Benefits Practice

The firm handles cases and advises clients on all aspects of ERISA and employee benefits. This includes fiduciary conduct with regard to investments and other matters, entitlement of individuals and groups of employees to benefits, federal preemption of state laws, benefit plan service-provider malpractice, prohibited transactions, and compliance with the requirements of the Department of Labor, Pension Benefit Guaranty Corporation, and other regulatory agencies. We also handle cases in related areas of law such as COBRA coverage, disability rights, and benefit-related employment discrimination claims.

Our work includes litigation regarding pension plans, including 401(k) plans and employee stock ownership plans (ESOPs), disability benefits, vacation pay, and medical benefits. The firm has successfully prosecuted cases that have restored hundreds of millions of dollars in benefits to employees and retirees. (A list of significant ERISA and employee benefits litigation is available upon request.) The firm has participated in groundbreaking ERISA cases before the U.S. Supreme Court and the federal Courts of Appeals, as counsel for either a party or amicus curiae.

In addition to these litigation services, **Jeffrey Lewis** and **Mr. Feinberg** have acted as mediators and been retained as expert witnesses in ERISA-related litigation. Members of the firm edit publications on employee benefits and have taught courses in employee benefits at law schools and at continuing education for attorneys programs. They also have testified before Congressional committees on employee benefits matters. Attorneys at the firm lecture and write extensively.

In November 2003, *The Recorder* newspaper named Jeffrey Lewis as the top attorney for ERISA plaintiffs in the San Francisco Bay Area and gave honorable mention to Daniel Feinberg. **Mr. Lewis, Mr. Feinberg, Mr. Jackson, Nina Wasow, and Ms. Worthman** all have been chosen as Northern California Super Lawyers for employee benefits matters, and **Ms. Nako** and **Julie Wilensky** have both been chosen as Northern California Rising Stars for employee benefit matters.

Discrimination and Civil Rights Practice

The firm's discrimination and civil rights practice focuses on employment and disability access. We prosecute race and sex employment discrimination class actions, and our litigation has transformed the pay and promotions practices of major companies such as Costco and Wet Seal. The firm has also represented people with mobility disabilities in class actions seeking equal access to places of public accommodation, such as restaurants and stores. The firm currently works with nonprofit advocacy groups in litigation against several large companies challenging the inaccessibility of hotel transportation services to people who use wheelchairs or scooters.

The firm is also a key player in working with advocates to make the internet fully accessible to people who are deaf or hard of hearing. LFLJ brought a precedent-setting suit against Netflix on behalf of the National Association of the Deaf that resulted in a settlement ensuring full captioning of Netflix's entire video library. The firm also represents the National Association of the Deaf and other advocates in lawsuits against Harvard University and Massachusetts Institute of Technology challenging the lack of closed captioning of online video content.

The firm's discrimination and civil rights practice also intersects with our ERISA practice, in that we represent same-sex spouses and partners, and transgender people, in employee benefit claims and litigation.

The employment discrimination and civil rights practice is headed by **Bill Lann Lee**, who was formerly the nation's top civil rights prosecutor as Assistant Attorney General for Civil Rights in the U.S. Department of Justice in the Clinton Administration.

APPOINTMENTS AND ACTIVITIES

In addition to their litigation, the firm's shareholders and associate attorneys participate in a variety of ERISA and employment-related activities.

Jeffrey Lewis served a three-year term as Co-Chair of the Employee Benefits Committee of the American Bar Association's Labor and Employment Section. He is one of the co-chairs of the Board of Senior Editors of *Employee Benefits Law* (BNA) and for many years he edited the ERISA chapter in *Employee Rights Litigation: Pleading and Practice* (Matthew Bender, 1991). He also was selected as a member of the College of Labor and Employment Lawyers, and he is a charter fellow of the American College of Employee Benefits Counsel, and he served on its Board of Governors. He has served on the faculty of several law schools, including presently at the University of California, Berkeley, School of Law, at which he has taught courses in employee benefits law. Mr. Lewis has served as a Co-Chair of the Fiduciary Responsibility subcommittee of the American Bar Association's Employee Benefits Committee and as Co-Chair of the Pension Committee of the National Employment Lawyers Association, and he has testified before Congressional committees regarding pension issues. Mr. Lewis serves as a mediator for the U.S. District Court for the Northern District of California and privately. He is a fiduciary of the Goodyear Retiree VEBA, a health and welfare trust fund providing medical benefits to 30,000 retired Goodyear Tire and Rubber Co. workers and beneficiaries, and outside of the practice is Chair of the Board of Trustees of the AC Transit Employees Retirement Plan. Mr. Lewis has been named a "Northern California Super Lawyer" in the Employee Benefits ERISA category each year from 2005 to present and as one of the top 100 lawyers in Northern California each of the past 5 years.

Daniel Feinberg is the author or co-author of many articles on ERISA topics published in *ERISA Litigation Reporter*, *The Practical Lawyer*, *Tax Management Compensation Planning Journal*, and *Labor Center Reporter*. Mr. Feinberg also has spoken on ERISA topics at many legal conferences. In November 2003, *The Recorder* newspaper gave Mr. Feinberg an honorable mention in the category of Top Attorney for ERISA Plaintiffs in the San Francisco Bay Area. Mr. Feinberg was appointed Special Master for settlement purposes in an ERISA class action by the U.S. District Court for the Middle District of Florida. He has been named a "Northern California Super Lawyer" in the Employee Benefits/ERISA category each year from 2005 to the present. From 2011 to 2015, Super Lawyers magazine has named him a Top 100 Northern California Lawyer. Mr. Feinberg has also taught a course on Employee Benefits Law at Berkeley Law (U.C. Berkeley).

Bill Lann Lee was the nation's top civil rights prosecutor as Assistant Attorney General for Civil Rights in the U.S. Department of Justice from 1997-2001. Mr. Lee chaired the bipartisan National Commission on the Voting Rights Act, which compiled evidence for the successful extension of the Act in July 2006. Mr. Lee served on the Board of the Bar Association of San Francisco and chaired its Equality Committee for several years until 2010. He also chaired the Bar Association of San Francisco's task force that produced a report on diversity in San Francisco law firms. Mr. Lee is the recipient of numerous honors and awards, including the California State Bar Diversity Award (2006), ABA Spirit of Excellence Award (2004), Anti-Defamation League Pearlstein Civil Rights Award (2002), the U.S. Department of Justice John Randolph Distinguished Service Award (2001), and the Pioneer Award from the Organization of Chinese Americans (2000). Mr. Lee has also been named a "Northern California Super Lawyer" in the Employment & Labor, Civil Rights/First Amendment category each year from 2004 to the present. From 2011 to 2015, Super Lawyers magazine has named him on its list of Top 100 Northern California Lawyers.

Todd Jackson served as Co-Chair of the Reporting and Disclosure subcommittee of the Employee Benefits Committee of the ABA's Labor and Employment Section and as a Chapter Editor of *Employee Benefits Law*. He is also the author of the "Mediating Wage and Hour Disputes" in the California Continuing Education of the Bar's *California Wage and Hour - Law and Litigation* and is a contributing author to the ABA's *The Fair Labor Standards Act*. He is a frequent speaker and writer on Wage and Hour and ERISA issues. Mr. Jackson is a chapter editor of the ABA's "Employee Benefits Law" and of the ABA's "The Fair Labor Standards Act" and has presented numerous articles on ERISA fiduciary rules and wage and hour litigation. Mr. Jackson is also co-author of the "Mediating Wage and Hour Disputes" chapter in the 2010 California Wage and Hour: Law and Litigation practice guide published by the Continuing Education of the Bar, California, which received the 2011 "Best Publication" Award of Professional Excellence given by the Association for Continuing Legal Education. He has been named a Northern California Super Lawyer every year since 2009.

Catha Worthman is a frequent writer and speaker on employee benefits and employment law matters. Ms. Worthman is the author of "Civil Penalties Under the California Private Attorneys General Act (PAGA)" in *Employment Damages and Remedies*, published in 2012 by Continuing Education of the Bar -- California. She is co-editor of the newsletter for the Employee Benefits Committee of the ABA's Labor and Employment Section and is also a Rewrite and Contributing Author to Sacher et al., *Employee Benefits Law* (BNA Books). From 2011 to 2014, she was selected as a "Northern California Rising Star" by Super Lawyers magazine and a Northern California Super Lawyer in 2015.

Lindsay Nako has served, or is serving, as class counsel in several class actions in the employee benefits and employment discrimination fields, including cases brought on behalf of pension plan participants and beneficiaries arising from imprudent investment of plan assets; employees and job applicants in cases alleging employment discrimination based on race, nationality, and gender; and employees who have suffered vacation pay forfeitures in vacation benefit plans sponsored by Voluntary Employees' Beneficiary Association (VEBA) trusts. Ms. Nako is a frequent speaker in these areas of practice at American Bar Association and National Employment Lawyers Association conferences. In addition, she is the Plaintiffs' Co-Chair of the ABA Labor & Employment Law, Employee Benefits Committee, Reporting & Disclosure Subcommittee, and a Rewrite and Contributing Author to Sacher et al., *Employee Benefits Law* (BNA Books). Ms. Nako has been selected as a "Northern California Rising Star" by Law & Politics magazine every year since 2009.

Nina Wasow advises clients and litigates individual disability and pension benefits claims as well as class-action breach of fiduciary duty claims under ERISA, including claims on behalf of participants and beneficiaries in employee stock ownership plans (ESOPs). Ms. Wasow is a frequent writer and speaker on employee benefits issues. She is a co-chair of the ABA Labor & Employment Law Employee Benefits Committee, Employment Discrimination and Employee Benefits Subcommittee, and a contributing author to Sacher et al., *Employee Benefits Law* (BNA Books). Ms. Wasow was selected as a "Northern California Rising Star" by Law & Politics magazine in 2011 and 2012 and a Northern California Super Lawyer from 2013 to 2015.

Julie Wilensky represents plaintiffs in class actions involving breach of fiduciary duty under ERISA, employment discrimination, and disability access. She also represents same-sex spouses and domestic partners in benefit claims and litigation. She is a co-chair of the Ethics Subcommittee of the ABA Labor and Employment Section Employee Benefits Committee. She is a frequent speaker on employment and employee benefits issues, particularly in the area of LGBT employee benefits, and is the co-author of the “Employee Benefits” chapter of *California Domestic Partnerships and Same-Sex Marriages* (CEB 2014, 2015 updates). In 2014 and 2015, she was named to the Northern California “Rising Stars” list by *Superlawyers* magazine. In 2015, the National LGBT Bar Association named her one of the “Best LGBT Lawyers Under 40.” Ms. Wilensky is a member of the board of directors and Amicus Committee chair of BALIF, the Bay Area’s LGBT bar association, and an active volunteer at the Legal Aid Society—Employment Law Center’s Workers’ Rights Clinic.

EDUCATION AND JUDICIAL CLERKSHIPS

Shareholders

Jeffrey Lewis

J.D., 1975, Berkeley Law School (University of California, Berkeley)
B.A., 1970, Yale University, New Haven, Connecticut

Daniel Feinberg

J.D., 1988, Berkeley Law School (University of California, Berkeley)
B.A., 1983, Swarthmore College, Swarthmore, Pennsylvania

Bill Lann Lee

J.D., 1974, Columbia Law School, New York, New York
B.A., 1971, Yale University, New Haven, Connecticut

Todd Jackson

1998-1999, Law Clerk to the Honorable Judith N. Keep
J.D., 1998, Berkeley Law School (University of California, Berkeley)
B.A., 1991, Johns Hopkins University, Baltimore, Maryland

Catha Worthman

2003-2004, Law Clerk to the Honorable William A. Fletcher
J.D., 2003, Berkeley Law School (University of California, Berkeley)
M.A., 2003, University of California, Berkeley, California
B.A., 1990, University of California, Berkeley, California

Lindsay Nako

J.D., 2005, Berkeley Law School (University of California, Berkeley)
B.A., 2001, University of California, Berkeley, California

Nina Wasow

2005-2006, Law Clerk to the Honorable Susan Graber
2006-2007, Law Clerk to the Honorable Sandra Brown Armstrong
J.D., 2005, New York University School of Law
B.A., 2000, Columbia University, New York, New York

Julie Wilensky

2009-2010, Law Clerk to the Honorable John T. Noonan, Jr.
2008-2009, Law Clerk to the Honorable Nicholas G. Garaufis
J.D., 2007, Yale Law School, New Haven, Connecticut
B.A., 2002, Yale University, New Haven, Connecticut

Associates

Joshua Davidson

J.D., 2009, Berkeley Law School (University of California, Berkeley)
B.A., 2004, University of California, Berkeley, California

Darin Ranahan

2012-2013, Law Clerk to the Honorable Edward M. Chen
J.D., 2010, Berkeley Law School (University of California, Berkeley)
B.A., 2005, Brown University, Providence, Rhode Island

Jacob Richards

2012-2013, Law Clerk to the Honorable Edward M. Chen
2010-2012, Law Clerk to Administrative Law Judge Steven Berlin (U.S. Department of Labor)
J.D., 2010, Berkeley Law School (University of California, Berkeley)
B.A., 2007, San Francisco State University

Michael Caesar

J.D., 2011, Stanford Law School, Stanford, California
B.A., 2001, University of California, Berkeley, California

Linda Lam

J.D., 2014, University of California, Hastings College of the Law
B.A., 2011, University of California, Los Angeles, California

BAR ADMISSIONS AND PROFESSIONAL ORGANIZATIONS

Jeffrey Lewis

State Bar of California

U.S. District Courts

Northern District of California
Eastern District of California
Central District of California
Southern District of California

U.S. Courts of Appeals

Second Circuit
Third Circuit
Fifth Circuit
Eighth Circuit
Ninth Circuit
Tenth Circuit

U.S. Supreme Court

American Bar Association, Employee Benefits Committee,
Labor and Employment Law Section

National Employment Lawyers Association

Bar Association of San Francisco

Daniel Feinberg

State Bar of California

U.S. District Courts

Northern District of California
Eastern District of California
Central District of California
Southern District of California

U.S. Court of Appeals

Fourth Circuit
Ninth Circuit
Eleventh Circuit

U.S. Supreme Court

American Bar Association, Employee Benefits Committee,
Labor and Employment Law Section

National Employment Lawyers Association

Bar Association of San Francisco

Bill Lann Lee

State Bar of California

New York State Bar Association

U.S. District Courts

Northern District of California
Central District of California
Southern District of New York

U.S. Courts of Appeals

Second Circuit
Third Circuit
Fourth Circuit
Fifth Circuit
Sixth Circuit
Eighth Circuit
Ninth Circuit
Tenth Circuit
Eleventh Circuit

U.S. Supreme Court

American Bar Association, Labor and Employment Law Section

Equal Employment Opportunity Committee and Occupational Safety & Health Law,
Section of Individual Rights and Responsibilities

Bar Association of San Francisco

National Employment Lawyers Association

Todd Jackson

State Bar of California

U.S. District Courts

Northern District of California
Eastern District of California
Central District of California
Southern District of California

U.S. Court of Appeals

Ninth Circuit

American Bar Association, Labor and Employment Section, Litigation Section

Bar Association of San Francisco

Catha Worthman

State Bar of California

U.S. District Courts

Northern District of California
Central District of California
Eastern District of California

U.S. Court of Appeals

Fourth Circuit

Ninth Circuit

U.S. Supreme Court

American Bar Association, Labor and Employment and Litigation Sections

National Employment Lawyers Association

California Employment Lawyers Association

Bar Association of San Francisco

Lindsay Nako

State Bar of California

U.S. District Courts

Northern District of California
Eastern District of California
Central District of California
Southern District of California

U.S. Court of Appeals

Ninth Circuit
Eleventh Circuit

American Bar Association, Labor and Employment Section, Litigation Section

National Employment Lawyers Association

Bar Association of San Francisco

Nina Wasow

State Bar of California

U.S. District Courts

Northern District of California
Central District of California
Eastern District of California

U.S. Court of Appeals

Eighth Circuit

American Bar Association, Labor and Employment Section

Bar Association of San Francisco

Julie Wilensky

State Bar of California

New York (all state courts)

Connecticut (all state courts)

U.S. District Courts

Northern District of California
Central District of California
Eastern District of California
District of Connecticut
District of Colorado

U.S. Court of Appeals

Second Circuit
Ninth Circuit
Eleventh Circuit

American Bar Association, Labor and Employment Section, Employee Benefits Committee

National Employment Lawyers Association

BALIF (Bay Area Lawyers for Individual Freedom)

Disability Rights Bar Association

Bar Association of San Francisco

Joshua Davidson

State Bar of California

U.S. District Courts

Northern District of California

American Bar Association, Labor and Employment Section

National Employment Lawyers Association

Bar Association of San Francisco

Darin Ranahan

State Bar of California

U.S. District Courts

Northern District of California
Eastern District of California

U.S. Court of Appeals

Ninth Circuit

American Bar Association, Labor and Employment Section

California Employment Lawyers Association

Bar Association of San Francisco

Jacob Richards

State Bar of California

U.S. District Courts

Northern District of California

Eastern District of California

Southern District of California

Central District of California

Eastern District of Michigan

American Bar Association, Labor and Employment Section

National Employment Lawyers Association

BALIF (Bay Area Lawyers for Individual Freedom)

Bar Association of San Francisco

Michael Caesar

State Bar of California

U.S. District Courts

Northern District of California

Eastern District of California

State Bar of California, Labor and Employment Section – Executive Committee

Bar Association of San Francisco

Linda Lam

State Bar of California

U.S. District Courts

Northern District of California

Bar Association of San Francisco

EXHIBIT B

EXHIBIT B

COMPLEX LITIGATION

Lewis, Feinberg, Lee & Jackson, P.C., specializes in litigation of employment and discrimination issues on behalf of workers and plaintiffs.

The following list includes a sample of complex, multi-plaintiff employment and civil rights cases litigated by Lewis, Feinberg, Lee & Jackson, P.C. (formerly known as Sigman, Lewis & Feinberg, P.C., Lewis & Feinberg, P.C., Lewis, Feinberg, Renaker & Jackson, P.C., and Lewis, Feinberg, Lee, Renaker & Jackson, P.C.):

Anthony v. Koch Industries, Inc., 2005 WL 3157590 (M.D.N.C. Nov. 25, 2005). On September 7, 2007, the court granted final approval to a multi-million dollar settlement in an ERISA class action arising out of reductions in retiree health benefits. The firm served as co-lead counsel for the class.

Arrez, et al. v. Kelly Servs., Inc., No. 07-cv-01289 (N. D. Ill.): The firm represented a state-wide class who alleged that Kelly Services, Inc., violated the Illinois Wage Payment and Collection Act by failing to pay class members for all of the unused vacation time that they had earned in their final paychecks. In addition, the Complaint alleged that Kelly Services, Inc. had failed to provide proper Wage Payment and Notice, as required by the Illinois Day and Temporary Labor Services Act. In October 2009, the case settled for \$11 million, one of the largest wage-and-hour class action settlements ever achieved for an Illinois-only class.

Bell v. Exec. Comm. of the UFCW Pension Plan for Employees, 191 F. Supp. 2d 10 (D.D.C. 2002). Lead counsel in class action arising out of pension fund hedge program. Settlements with plan trustees, investment manager and investment advisor resulted in the restoration of \$10 million to the plan.

Burrey v. Pacific Gas & Elec. Co., 159 F.3d 388, 22 EBC 1887 (9th Cir. 1998). Counsel for group of employees excluded from benefit plans as “leased employees.” Ninth Circuit reversed summary judgment for employer and remanded to district court for consideration of evidence that plaintiffs were common-law employees.

Canseco v. Construction Laborers Pension Trust, 93 F.3d 600 (9th Cir. 1996). The firm served as co-counsel for a class of pension plan retirees. The circuit court opinion reversed the district court's judgment for defendants and resulted in the payment of millions of dollars in retroactive benefits to class members.

Clarke v. Lindeman, et al., No. 09-cv-03467-JAM (E.D. Cal.): The firm represented participants and beneficiaries of the Valley Aggregate Transport, Inc. ESOP. The suit alleged that the defendant breached his fiduciary duties by selling 100% of the stock of Valley Aggregate to the Company's employees for more than twice what it was worth and purchasing the promissory note used to fund the ESOP transaction at a discount and for his own benefit. On December 14, 2011, the court certified the class and granted final approval of a settlement providing for over \$2.2 million in payment to the ESOP and the forfeiture of the individual defendants' ESOP shares. Final judgment was entered on January 10, 2012.

Cogdell et al. v. The Wet Seal, Inc., No. SACV 12-01138 AG (C.D. Cal.): The firm and co-counsel represent a proposed class of current and former Wet Seal employees in a suit charging discrimination against African-American store management employees. The court granted preliminary approval of a classwide settlement that provides for injunctive relief and a monetary recovery of \$7.5 million. The final approval hearing is scheduled for November 2013.

Colorado Cross-Disability Coalition, et al. v. Abercrombie & Fitch Co., et al., No. 1:09-cv-02757-WYD-KMT (D. Colo.): This case, brought on behalf of a class of wheel chair users, challenged Abercrombie & Fitch's construction of a two-step platform in front of approximately 250 Hollister stores across the country to give the stores the appearance of a California surf shack. After granting summary judgment in spring 2013, the district court issued an injunction requiring Hollister to remove the barriers over the next three years.

Danieli v. Int'l Bus. Machines Corp., No. 08-cv-3688-SHS (S.D.N.Y.): The firm and co-counsel represented a nationwide class of present and former technology workers for IBM who alleged that they had been improperly classified as exempt from the overtime requirements of the FLSA and various states' wage and hour laws. In October 2009, the case settled for \$7.5 million.

Dodson, et al. v. Lone Star Techs., Inc., et al. (U.S. District Court, N.D. Tex., No. 3-91 CV 2574 T). Counsel for class of retirees and employees of Lone Star Technologies. Complaint alleged that defendants' selection of Executive Life Insurance Company to provide annuities to pension plan participants (upon termination of the plan) violated ERISA's fiduciary standards. Case settled for approximately \$1.5 million.

Fernandez v. K-M Indus. Holding Co., Inc., 646 F. Supp. 2d 1150 (N.D. Cal. 2009): The firm represented as co-counsel a class of employees of Kelly-Moore Paint Company and CIG (an insurance company which, along with Kelly-Moore, was owned by K-M Industries Holding Co., Inc.) who were participants and beneficiaries of the K-M Industries Holding Co., Inc. ESOP. Plaintiffs alleged that Defendants breached their fiduciary duties under ERISA by causing the ESOP to purchase employer stock at an inflated price. Plaintiffs settled with the Company and the family trust of its founder, William Moore, after briefing but before decision on their motion for summary judgment on the statute of limitations. Plaintiffs settled with the successor trustee of the ESOP after briefing but before decision on a motion for summary judgment on the merits. Class-wide settlements resulted in the payment of \$55 million to the class.

Gerlach v. Wells Fargo & Co., No. 05-cv-0585-CW, 2005 WL 6792423 (N.D. Cal. June 13, 2005): In 2007, the United States District Court for the Northern District of California granted final approval to a class action settlement of \$12.8 million involving a class of employees who were classified as exempt from overtime pay requirements under the FLSA and California law, and thereby deprived of overtime pay protections under these laws.

Gerlib v. R. R. Donnelley & Sons Co., 2002 WL 1285795 (N.D. Ill. June 11, 2002), and 2001 WL 1313794 (N.D. Ill., Oct. 26, 2001); *Jefferson v. R. R. Donnelley & Sons Co.*, 2001 WL 699123 (N.D. Ill. June 20, 2001). The firm represented classes totaling more than 600 plan participants seeking benefits under pension and severance plans sponsored by R.R. Donnelley &

Sons Co. The ERISA action settled for \$15 million after summary judgment was granted for plaintiffs on two out of three pension claims and one out of two severance claims.

Giannetto v. Computer Sciences Corp., No. 05-cv-8201-TJH (C.D. Cal.): In 2005, the United States District Court for the Central District of California granted final approval for a settlement of \$24 million for a class of technology workers claiming that they had been improperly classified as exempt under the FLSA and state overtime laws of 13 states.

Gonzalez, et al. v. Abercrombie & Fitch Stores, Inc., et al., Nos. 03-cv-2817 SI, 04-cv-4730, and 04-cv-4731 (N.D. Cal.): Female and minority applicants to and employees of the retail clothing giant alleged that the company discriminates against women, Latinos, African Americans, and Asians in recruitment, hiring, job assignment, training and promotion. Final approval of a settlement was granted by Judge Illston on April 14, 2005. The settlement certified a class action, changed an array of employment practices, paid the class \$40 million in monetary relief, and entered into a consent decree mandating changes to an array of its employment practices.

Gottlieb v. SBC Communic'ns, Inc., No. CV 00-4139 AHM (C.D. Cal.). The firm, along with co-counsel, was Class Counsel in an ERISA action on behalf of employees of what was formerly known as Pacific Telesis Group. That action alleged that plan fiduciaries breached their fiduciary duty by eliminating one of the investment funds in its 401(k) plan -- stock of a former subsidiary. The case settled, resulting in the payment of over \$7 million in additional benefits to class members.

Gutierrez v. Schmid Insulation Contractors, et al., No. 08-cv-6010-DSF (C.D. Cal.): On March 9, 2009, the United States District Court for the Central District of California granted final approval of a settlement of \$8.5 million for a class of present and former California installers for Schmid Insulation Contractors and Masco Contractor Services of California. The class had alleged that they were denied minimum wage and overtime and subject to unlawful wage deductions.

Holloway, et al. v. Best Buy Co., Inc., No. 05-cv-05056-PJH (N.D. Cal.): The firm represented a class of female and minority applicants to and employees of Best Buy. The lawsuit charged that Best Buy recruits, hires and maintains a disproportionately white male sales force from which it then promotes a disproportionately white male management force. Judge Hamilton approved a settlement agreement of November 9, 2011 that certified a class, provided injunctive relief that improved advancement practices for the class, and granted attorneys' fees and costs.

Horn v. McQueen, 215 F. Supp. 2d 867 (W.D. Ky. 2002): The firm represented as co-counsel a group of employees of the U.S. Corrections Corp. of America. After trial, the Court held that defendants had breached their fiduciary responsibilities under ERISA by causing the pension plan to purchase sponsoring employer stock at an inflated price. Class-wide settlements resulted in the payment of over \$13 million.

In re Consolidated Capital Consultants Litig., No. 00-cv-1290-KI (D. Or.): The firm served as plaintiffs' co-counsel in four consolidated class actions in the District of Oregon

arising from the largest pension investment fraud in U.S. history. We achieved settlements of the classes' breach of fiduciary duty claims against the plans' trustees and investment advisors which resulted in payment of approximately \$13 million to the plans.

In re Farmers Ins. Exch. Claims Representatives' Overtime Pay Litig., No. MDL 33-1439, 2008 WL 4763029 (D. Or. Oct. 28, 2008): Plaintiffs alleged that Defendant misclassified class members as exempt from being paid overtime under federal and state wage and hour laws and did not credit overtime under certain benefit plans. Several similar lawsuits were consolidated into a single Multi-District Litigation case. The claims were certified as class actions in 2003. A class-wide settlement of \$8 million was approved on August 23, 2010.

In re Indymac Bank ERISA Litig., 08-04579 DDP (VBKx) (C.D. Cal.). LFLRJ was appointed co-lead counsel in this consolidated action alleging breach of fiduciary duty by the fiduciaries of the 401(k) plan sponsored by IndyMac Bank for allowing the plan to invest in IndyMac stock when the stock was an imprudent investment. IndyMac was one of the major lenders caught up in the collapse of the subprime and Alt-A mortgage market and was taken into receivership by the FDIC in July 2008. In January 2011, the district court granted final approval of a \$7 million class action settlement.

In re Masters, Mates & Pilots Pension Plan & IRAP Litig. (U.S. District Court, S.D.N.Y., Lead File No. 85 Civ. 9545 VLB). Plaintiffs' counsel in two certified class actions arising out of two employee benefit plans' losses of tens of millions of dollars in investments. Settlements of clients' fiduciary breach claims against plan trustees and former investment manager, and of malpractice claims against former plan counsel, together with settlements of consolidated cases (involving former trustee for plans and former plan auditor) resulted in the restoration of over \$20 million to the plans. One portion of case reported *sub nom Beck v. Levering*, 947 F.2d 639 (2d Cir. 1991), cert. denied, 112 S. Ct. 1037 (1992).

In re Worldcom, Inc. ERISA Litig., Master File No. 02 Civ. 4816 (DLC) (S.D.N.Y.). Jeffrey Lewis served as one of the two Steering Committee members for this litigation, and was appointed specifically to advise Lead Counsel on ERISA issues. In 2004, the United States District Court for the Southern District of New York approved a partial settlement of a nationwide class action lawsuit on behalf of participants in WorldCom's 401(k) plan. Under the terms of the settlement, more than \$47 million was paid by the settling defendants. The court also approved settlements with the remaining defendants. In March 2002, even before the bankruptcy of WorldCom, LFLRJ, along with co-counsel, filed the first ERISA class action lawsuit against fiduciaries of the plan, and then obtained a significant decision from the United States District Court for the Northern District of California rejecting a motion to dismiss the case. See 2002 WL 316440557 (N.D.Cal. 2002).

In re: Capital Consultants, LLC Litigation (U.S. District Court, D Ore., No. CV 00-1290-KI). Lead counsel in four related class actions arising out of the largest pension investment fraud in U.S. history. Settlements with plan trustees and service providers resulted in the restoration of over \$12 million to the plans.

Kairy v. SuperShuttle Inc., 660 F.3d 1146 (9th Cir. 2011). The firm, with co-counsel, represents current and former SuperShuttle van drivers in California. Plaintiffs contend that

SuperShuttle misclassified the drivers and, as a result, violated California law and the federal Fair Labor Standards Act (“FLSA”) by failing to pay overtime, failing to pay minimum wage, failing to reimburse business expenses, taking wrongful paycheck deductions, and failing to provide lawful meal breaks. A class-wide settlement of \$12 million was preliminarily approved on June 12, 2014, and is awaiting final approval.

Kayes et al. v. Pacific Lumber Co., et al., 51 F.3d 1449 (9th Cir. 1995). Counsel for class of retirees and employees of Pacific Lumber Co. Complaint alleged that defendants’ selection of Executive Life Insurance Company to provide annuities to pension plan participants (upon termination of the plan) violated ERISA’s fiduciary standards. Ninth Circuit U.S. Court of Appeals decision upheld plaintiffs’ standing to pursue the claims, affirmed lower court finding that defendant corporate officers were fiduciaries, broadly defined term “plan asset” for purposes of ERISA’s prohibited transaction provisions, and affirmed rights to proceed on class action basis and to seek interim attorneys’ fees in ERISA cases. On remand, case settled for \$7 million.

Lively v. Dynegy, Inc., No. 05-cv-0063-MJR, 2008 WL 4657792 (S.D. Ill. Sept. 30, 2008): The firm represented participants and beneficiaries of the Illinois Power Incentive Savings Plan for Collectively Bargained Employees, which was taken over by energy trading company Dynegy, Inc., when Dynegy purchased Illinois Power. The suit alleged that Dynegy and the individuals running the plan knew that the accounting improprieties made company stock an imprudent investment for the plan and breached their fiduciary duties by continuing to allow investment in company stock despite that knowledge. A \$17.9 million settlement was approved in 2008.

Lucas v. Kmart Corp., 234 F.R.D. 688 (D. Colo. 2006): Customers of the discount retail chain who use wheelchairs and scooters for mobility alleged that the company discriminates against them because of architectural barriers and policies. The class was certified in 2005, and a damages class was certified for purposes of settlement in 2006. Kmart paid the class \$13 million and agreed to survey and bring all of its stores nationwide into substantial compliance with accessibility standards and institute policies to improve access.

Mertens v. Hewitt Assocs., 508 U.S. 248 (1993). Counsel for class of former plan participants in action arising out of underfunding of retirement plan upon termination. Case clarified the remedies available against non-fiduciaries under ERISA, and has been influential in delineating scope of ERISA remedies more generally. Following the Supreme Court decision, alternative state law claims against the defendant actuarial consulting firm settled successfully in U.S. District Court, along with companion case against plan fiduciaries. See *Mertens v. Kaiser Steel Retirement Plan*, 829 F. Supp. 1158 (N.D. Cal. 1992) (state law claims not preempted by ERISA); *Mertens v. Black*, 948 F.2d 1105 (9th Cir. 1991) (claims against fiduciaries not precluded by res judicata or collateral estoppel).

National Association of the Deaf v. Netflix, Inc. National Association of the Deaf et al. v. Netflix, Inc., Case No. 11-cv-30168 MAP (D. Mass.) This case resulted in a consent decree requiring Netflix to closed caption the streaming videos on its popular Watch Instantly service, thereby making it fully accessible to the deaf and hard of hearing. In an important, precedential ruling denying Netflix’s motion for judgment on the pleadings, the Court held that Netflix is a place of public accommodation under the ADA, accepting that the ADA applies to website-only

businesses. LFLRJ represented Plaintiffs along with co-counsel Disability Rights Education and Defense Fund (DREDF), and Sugarman, Rogers, Barshak & Cohen.

Neil v. Zell, 275 F.R.D.256 (N.D. Ill. 2011): The firm represented participants and beneficiaries of the Tribune Company ESOP in a certified class action pending in the Northern District of Illinois. Plaintiffs alleged that defendants breached fiduciary duties and engaged in prohibited transactions in the 2007 Leveraged ESOP Transaction which permitted Sam Zell to take control of the Tribune Company. Tribune Company filed bankruptcy less than a year after the Transaction, and the ESOP's stock is now worthless. After ruling in Plaintiffs' favor on several motions, the court approved plaintiffs' motion for class certification and appointed LFLRJ and co-counsel as counsel for the class. A class-wide settlement of \$32 million was finally approved in January 2012.

Orsolini v. Mead Clark Lumber Co., Inc., No. 10-cv-04478-SBA (N.D. Cal.): The firm represented as co-counsel participants and beneficiaries of the Mead Clark Lumber Company 401(k) Profit Sharing Plan. The suit alleged that the company and other fiduciaries breached their fiduciary duty to the plan by imprudently investing plan assets in real property loans that resulted in significant losses to the plan. The class was certified on June 14, 2011. On July 25, 2012, the court granted final approval of an \$800,000 settlement.

Patelski v. The Boeing Corp., Lead File No. 01 Civ. 7159 GBD (S.D.N.Y.). The firm served as one of plaintiff's counsel in a certified class action seeking to force defendants to fully or partially terminate a VEBA Trust established to pay retiree medical premiums and to distribute funds to retirees and their surviving spouses. Pursuant to a settlement in 2003, the Trust was terminated and tens of millions of dollars were paid out to the Class.

Paulsen v. CNF, Inc., 559 F.3d 1061 (9th Cir. 2009). LFLRJ was class counsel for a certified class of salaried retirees of Consolidated Freightways Corporation ("CFC") whose pensions were reduced when the CFC Pension Plan came under the trusteeship of the Pension Benefit Guaranty Corporation upon CFC's bankruptcy. In 2011, the court granted final approval of a \$9 million settlement on Plaintiffs' actuarial malpractice claims.

Rosenburg v. Int'l Bus. Machines Corp., No. 06-cv-00430-PJH, 2007 WL 2043855 (N.D. Cal. July 12, 2007): In July 2007, the United States District Court for the Northern District of California granted final approval of a settlement of \$65 million for a class of present and former technology workers employed by IBM.

Rummel, et al. v. Consol. Freightways, Inc., et al. (U.S. District Court, N.D. Cal., No. C-91-4168 DLJ). Counsel for plaintiff class in class action alleging wrongful diversion of assets of Emery Air Freight Corporation Employee Stock Ownership Plan after purchase of Emery Air Freight by Consolidated Freightways. Class members received cash payments through settlement.

Tatum v. RJR Pension Investment Committee, 761 F.3d 346 (4th Cir. 2014): The firm and co-counsel represent a certified class of more than 3,500 employees, retirees, and beneficiaries seeking to recover over \$50 million in retirement savings that were lost as a result of the mismanagement of the R.J. Reynolds Tobacco Company Capital Investment Plan, a

401(k) plan. Following a bench trial, the district court held that although defendants had breached their fiduciary duties, because a hypothetical prudent fiduciary could have made the same decision, the fiduciaries' imprudence was not the legal cause of the Plan's losses. Plaintiff successfully appealed this decision to the Fourth Circuit.

Taylor v. ANB Bancshares, Inc. et al., No. 08-5170, 2010 WL 4627672 (W.D. Ark. Nov. 4, 2010). LFLRJ represented the certified class in this action regarding pension plans sponsored by Arkansas National Bank, which was taken over by the FDIC in 2008. The complaint asserted breaches of fiduciary duty arising out of the defendant fiduciaries' failure to act prudently with regard to plan investments in bank stock. The court refused to dismiss the bulk of Plaintiffs' claims, certified a class, and ultimately granted final approval to a \$2 million settlement.

Thirtyacre v. James River Corp. of Nevada, et al. (U.S. District Court, N.D. Cal., No. C-91-0217 CAL). Counsel for certified class of former employees of James River Corporation in action for increased benefits under a retirement plan. Settlement provided for cash payments to former employees.

Trotter v. Perdue Farms, Inc., 2001 WL 1002448 (D. Del. 2001): The firm served as co-counsel for a ten-state class of employees working for one of the nation's largest poultry processors. Plaintiffs challenged the defendant's failure to pay employees for their time cleaning protective equipment. In an action under the FLSA, various states' wage and hour laws, and ERISA, the parties negotiated a \$10 million settlement. The ERISA preemption aspect of the case is reported at 168 F. Supp. 2d 277 (D. Del. 2001).

Turpin v. Consolidated Coal Co., No. 99-1886 (W.D. Pa.). The firm served as co-counsel in this ERISA class action challenging the use of standardized "Explanation of Benefits" forms by a major insurer and administrator of ERISA-covered health insurance plans. The Court approved a settlement of the case pursuant to which defendant Highmark, Inc. (d/b/a as Blue Shield of Pennsylvania) made major revisions to its claims processing systems.

Udd v. Vidinsky, et al., No. CV 04-05080 JW (N.D. Cal.). The firm represented participants and beneficiaries of the Valin Corporation Amended Employee Stock Ownership Plan, alleging breach of fiduciary duties and a prohibited transaction with respect to a July 12, 2001 purchase by the plan of Valin shares from the family trust of its founder and president, Alan Vidinsky. Mr. Vidinsky acted on behalf of both his family trust and the plan in the transaction, and the suit alleged that the \$6 million the plan paid for 77,250 shares was too high a price. Pursuant to a settlement approved in 2006, the plan received an additional 53,327 shares worth approximately \$3.13 million including interest.

Vallabhapurapu et al., v. Burger King Corp., No. 11-cv-00667-WHA, 2012 WL 5349389 (N.D. Cal. Oct. 29, 2012); *Castaneda, et al., v. Burger King Corp.*, No. 8-cv-04262-WHA, 2010 WL 2735091 (N.D. Cal. July 12, 2010): The initial settlement consisted of \$5 million to the class and injunctive relief requiring the removal of architectural barriers and discriminatory policies. On February 14, 2011, Plaintiffs filed a new lawsuit addressing the remaining restaurants. This case settled on October 29, 2012 and provided a payment of \$19 million and similar injunctive relief.

Vaughn v. Bay Environmental Mgmt., Inc., 544 F.3d 1008 (9th Cir. 2008), *amended*, 567 F.3d 1021 (June 4, 2009) (reversing dismissal). The firm represented a certified class of approximately 90 participants in two terminated defined contribution plans whose fiduciaries were alleged to have breached their duties of prudence and loyalty in selecting and monitoring investments for the plans. In February 2011, the Court approved a \$1.9 million class action settlement.

Vincent v. Reser, No. 11-cv-03572-CRB, 2013 WL 621865 (N.D. Cal. Feb. 19, 2013): The complaint, filed in July 2011, alleged that the former owner of the Southern California Pipeline Construction, Inc. (“SCPC”) Employee Stock Ownership Plan (“ESOP”) sold 100% of SCPC’s stock to the ESOP for more than fair market value in a November 2007 transaction. The SCPC stock owned by the ESOP currently has no value. The settlement, approved in February 2013, provides for a \$5,125,000 payment to the SCPC ESOP for the benefit of the Plan’s participants.

Wynne, et al. v. McCormick & Schmick’s Seafood Restaurants, Inc. et al., No. 06-cv-3153-CW (N.D. Cal.): African-American restaurant-level hourly employees of the restaurant chain alleged that company fails to hire qualified African Americans and instead favors white job applicants and employees in an effort to present a white image to the public on a nationwide basis. In 2008, Judge Wilken approved a nationwide class action settlement that included significant injunctive relief to reform the way the company selects, promotes, and retains African American employees in addition to money damages.

EXHIBIT C

EXHIBIT C
LEWIS, FEINBERG, LEE & JACKSON, P.C.
Cancilla v. Ecolab

Hours & Fees Per Task Code through 08/20/2015

Date	Atty/	Category	Description	Time	Value	Value
8/9/2012	AL	9	Review and edit stipulation to amend complaint.	0.1	\$475.00	\$47.50
8/9/2012	AL	17	Review and analyze drafts of motions re: venue.	0.4	\$475.00	\$190.00
8/15/2012	AL	17	Review draft stipulation and emails re: same.	0.1	\$475.00	\$47.50
8/20/2012	AL	16	Intra-office conference with T. Jackson re: case management	0.1	\$475.00	\$47.50
8/20/2012	AL	16	Review draft case management statement and emails re: same.	0.2	\$475.00	\$95.00
8/20/2012	TJ	16	Review emails regarding case status	0.3	\$700.00	\$210.00
8/20/2012	TJ	16	Intra-office conference with A. Lah re: case status.	0.1	\$700.00	\$70.00
8/24/2012	AL	17	Review and analyze Defendant's response to motion to transfer venue.	0.2	\$475.00	\$95.00
8/27/2012	AL	17	Review venue briefs and prepare for call with team.	0.2	\$475.00	\$95.00
8/27/2012	AL	16	Conference call with team and Intra-office conference with T. Jackson re: same.	0.4	\$475.00	\$190.00
8/27/2012	TJ	16	Conference call with team and Intra-office conference with A. Lah re: same.	0.4	\$700.00	\$280.00
8/28/2012	AL	16	Emails re: co-counsel agreement.	0.1	\$475.00	\$47.50
8/28/2012	AL	4	Review and edit initial disclosures and emails re: same.	0.4	\$475.00	\$190.00
8/30/2012	AL	17	Review and edit reply brief re: venue; email with team re: same.	0.3	\$475.00	\$142.50
8/30/2012	TJ	17	Edit reply brief re venue	0.6	\$700.00	\$420.00
9/4/2012	AL	4	Review defendant's initial disclosures and P's initial disclosures; emails to P. Browne re: file organization.	0.2	\$475.00	\$95.00
9/10/2012	AL	4	Review and edit draft discovery requests.	0.3	\$475.00	\$142.50
9/12/2012	AL	4	Emails re: RFP.	0.1	\$475.00	\$47.50
9/17/2012	AL	3	Review lawsuit filed by Outten firm against Ecolab.	0.1	\$475.00	\$47.50
9/17/2012	AL	10	Further review of wage and hour case law.	1.5	\$475.00	\$712.50
9/19/2012	AL	10	Analyze Feess decisions on FLSA.	0.7	\$475.00	\$332.50
10/10/2012	AL	16	Review draft case management statement.	0.2	\$475.00	\$95.00
10/25/2012	AL	17	Intra-office conference with T. Jackson and emails re: venue hearing.	0.1	\$475.00	\$47.50
10/26/2012	AL	17	Travel to and from court.	1.0	\$475.00	\$475.00
10/26/2012	AL	17	Attend hearing re: venue and brief meeting with co-counsel.	1.0	\$475.00	\$475.00
11/27/2012	AL	4	Review and analyze meet and confer letter.	0.2	\$475.00	\$95.00
12/6/2012	AL	5	Emails re: depositions.	0.1	\$475.00	\$47.50
12/6/2012	AL	16	Review and edit stipulation extending deadlines.	0.1	\$475.00	\$47.50
12/7/2012	AL	16	Email to co-counsel re: discovery.	0.1	\$475.00	\$47.50
12/10/2012	AL	16	Telephone message from co-counsel re: discovery.	0.1	\$475.00	\$47.50
12/18/2012	AL	4	Review meet and confer letters and prepare for call and call with team.	1.1	\$475.00	\$522.50
12/19/2012	AL	6	Review and analyze documents, review research memo	2.2	\$475.00	\$1,045.00
12/20/2012	AL	6	Review and analyze documents and memos; emails re: same.	1.3	\$475.00	\$617.50
12/20/2012	EK	6	Prepare document index.	6.3	\$225.00	\$1,417.50
12/27/2012	AL	3	Emails re: commission pay.	0.1	\$475.00	\$47.50

EXHIBIT C
LEWIS, FEINBERG, LEE & JACKSON, P.C.

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Date	Atty/	Category	Description	Time		Value
1/2/2013	AL	4	Review and analyze second request for production.	0.2	\$475.00	\$95.00
1/8/2013	AL	14	Review and analyze summary of deposition of N. Cancilla and related emails.	0.2	\$475.00	\$95.00
1/17/2013	AL	16	Emails re: team call.	0.1	\$475.00	\$47.50
1/18/2013	AL	14	Emails re: transcripts.	0.1	\$475.00	\$47.50
2/6/2013	AL	14	Review and analyze N. Cancilla deposition transcripts.	1.0	\$475.00	\$475.00
2/7/2013	AL	14	Review and analyze deposition transcripts.	1.9	\$475.00	\$902.50
2/12/2013	AL	10	Review and analyze motions for summary judgment.	1.6	\$475.00	\$760.00
2/12/2013	AL	4	Intra-office conference with L. Lim re: discovery.	0.1	\$475.00	\$47.50
2/15/2013	AL	16	Catch up on emails re: consent to join.	0.2	\$475.00	\$95.00
2/25/2013	AL	10	Review and analyze draft opposition brief.	0.3	\$475.00	\$142.50
2/25/2013	AL	10	Conference call with team re: draft brief.	0.6	\$475.00	\$285.00
3/5/2013	AL	10	Review and analyze Ecolab's Opposition brief.	0.3	\$475.00	\$142.50
3/5/2013	AL	4	Review discovery letters.	0.2	\$475.00	\$95.00
3/7/2013	AL	10	Conference call with team re: summary judgment and prepare for same.	0.5	\$475.00	\$237.50
3/7/2013	AL	16	Review and edit co-counsel agreement.	0.2	\$475.00	\$95.00
3/18/2013	AL	10	Review and analyze draft reply brief.	0.3	\$475.00	\$142.50
3/25/2013	AL	16	Emails re: retainer agreement.	0.1	\$475.00	\$47.50
3/25/2013	AL	10	Intra-office conference with T. Jackson re: summary judgment hearing.	0.1	\$475.00	\$47.50
4/8/2013	AL	16	Conference call with team re: case issues.	0.2	\$475.00	\$95.00
4/12/2013	AL	16	Review revised retainer re: additional firms.	0.1	\$475.00	\$47.50
4/24/2013	AL	16	Review co-counsel agreement and emails re: same.	0.2	\$475.00	\$95.00
8/27/2013	DR	16	Meeting w/ T. Jackson & C. Worthman re status of case	0.1	\$350.00	\$35.00
8/27/2013	DR	16	Review docket & email C. Caprara re updating case files	0.1	\$350.00	\$35.00
9/9/2013	DR	3	Meeting w/ C. Worthman re contacting collective action members	0.1	\$350.00	\$35.00
9/10/2013	DR	6	Review docs on shared Google Drive	0.1	\$350.00	\$35.00
9/10/2013	DR	3	Meeting with C. Worthman re intake outreach; call w/ C. Chan re intake outreach	0.2	\$350.00	\$70.00
9/10/2013	DR	3	Email E. Garcia re outreach to collective members	0.1	\$350.00	\$35.00
9/13/2013	EG	3	Review complaint for intake calls.	0.8	\$225.00	\$180.00
9/17/2013	DR	3	Meeting with C. Worthman re client calls; email E. Garcia re same	0.1	\$350.00	\$35.00
9/18/2013	DR	3	Meeting with E. Garcia re collective member calls; Meeting with C. Worthman re same; email legal assistants re same	0.4	\$350.00	\$140.00
9/18/2013	DR	3	Email C. Caprara & M. Kintz re collective member calls	0.1	\$350.00	\$35.00
9/18/2013	DR	3	Meeting with C. Caprara & E. Garcia re collective member calls	0.3	\$350.00	\$105.00
9/18/2013	EG	3	Review intake materials and emails.	0.5	\$225.00	\$112.50
9/18/2013	EG	3	(Kevin Rash) Intake and follow up email.	1.9	\$225.00	\$427.50

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9/18/2013	EG	3	Email to co-counsel re intakes.	0.2	\$225.00	\$45.00
9/18/2013	EG	3	Setting up spreadsheets and folders to track intakes.	0.8	\$225.00	\$180.00
9/19/2013	EG	3	Intakes.	1.4	\$225.00	\$315.00
9/20/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
9/20/2013	EG	3	Email co-counsel re status of intakes.	0.3	\$225.00	\$67.50
9/20/2013	EG	3	(Jamie Ocana) Intake.	1.5	\$225.00	\$337.50
9/23/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
9/23/2013	DR	3	Email E. Garcia re collective member calls	0.1	\$350.00	\$35.00
9/23/2013	EG	3	Scheduling intake calls.	1.2	\$225.00	\$270.00
9/24/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
9/24/2013	EG	3	Intake calls.	1.0	\$225.00	\$225.00
9/24/2013	EG	3	Set up intake calls.	1.8	\$225.00	\$405.00
9/25/2013	EG	3	Update intake spreadsheet.	0.5	\$225.00	\$112.50
9/26/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
9/26/2013	EG	3	Schedule intake calls.	0.8	\$225.00	\$180.00
9/26/2013	EG	3	Update spreadsheet and upload intakes to shared drive.	1.5	\$225.00	\$337.50
9/26/2013	EG	3	(Mike Shambaugh) Intake interview.	1.6	\$225.00	\$360.00
9/30/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
9/30/2013	DR	3	Meeting with E. Garcia & Meeting with C. Worthman re what to do when collective members have other claims they'd like to talk about	0.2	\$350.00	\$70.00
9/30/2013	EG	3	Upload docs to shared drive and update intake log.	1.5	\$225.00	\$337.50
10/1/2013	EG	3	(Mosley Robinson) Intake.	1.6	\$225.00	\$360.00
10/1/2013	EG	3	(Alan Lenneman) Intake.	1.2	\$225.00	\$270.00
10/1/2013	EG	3	Update on intake list.	0.5	\$225.00	\$112.50
10/3/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/3/2013	DR	3	Meeting with C. Caprara re distinction between trainees and service specialists for California sub-class, look up complaint discussion of same	0.2	\$350.00	\$70.00
10/4/2013	EG	3	(Daniel Schaberg) Intake.	0.5	\$225.00	\$112.50
10/7/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/7/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/7/2013	DR	3	Review email from M. Frandsen re intakes; email E. Garcia & C. Caprara re same	0.1	\$350.00	\$35.00
10/7/2013	EG	3	Send co-counsel update re intakes.	0.6	\$225.00	\$135.00
10/7/2013	EG	3	Upload docs to shared drive and update spreadsheet.	0.8	\$225.00	\$180.00
10/8/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/8/2013	EG	3	Update shared spreadsheet.	0.8	\$225.00	\$180.00
10/8/2013	EG	3	Schedule intake calls.	1.0	\$225.00	\$225.00
10/8/2013	EG	3	(Steven Maynard) Intake.	1.8	\$225.00	\$405.00
10/9/2013	DR	3	Review E. Garcia & C. Caprara work calling collective members	0.4	\$350.00	\$140.00
10/9/2013	EG	3	Schedule intakes.	1.0	\$225.00	\$225.00
10/9/2013	EG	3	(John Reyes Jr) Intake.	1.2	\$225.00	\$270.00

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Date	Atty/	Category	Description	Time		Value
10/9/2013	EG	3	(John Norwood) Intake.	1.2	\$225.00	\$270.00
10/9/2013	EG	3	Update shared spreadsheet, and email attys re status report.	0.8	\$225.00	\$180.00
10/10/2013	EG	3	Schedule intakes.	0.8	\$225.00	\$180.00
10/15/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/17/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/17/2013	CCa	3	Ecolab intake interview	1.0	\$200.00	\$200.00
10/17/2013	EG	3	(Steven Schmidt) Intake.	1.1	\$225.00	\$247.50
10/17/2013	EG	3	Update intake spreadsheet.	0.4	\$225.00	\$90.00
10/17/2013	EG	3	Scheduling intakes.	0.6	\$225.00	\$135.00
10/18/2013	DR	16	Conference call with co-counsel re discovery, outreach to collective members; email C. Worthman, S. Wakschlag, A. Karl, & M. Sweeney re same	1.5	\$350.00	\$525.00
10/18/2013	EG	3	Call & schedule intakes.	1.0	\$225.00	\$225.00
10/21/2013	EG	3	Upload completed intakes to shared drive and update spreadsheet.	0.9	\$225.00	\$202.50
10/22/2013	EG	3	Schedule intakes.	0.6	\$225.00	\$135.00
10/22/2013	EG	3	Update shared spreadsheet.	1.4	\$225.00	\$315.00
10/23/2013	AKa	9	Researching various states' wage and hour laws.	3.1	\$275.00	\$852.50
10/23/2013	DR	9	Call with A. Karl re memo on applicable state law; Meeting with A. Karl re same	0.2	\$350.00	\$70.00
10/23/2013	DR	9	Review memo from A. Karl re state law claims; email A. Karl & C. Worthman re same	0.1	\$350.00	\$35.00
10/23/2013	EG	3	(Elmo Keene) Intake.	1.5	\$225.00	\$337.50
10/23/2013	EG	3	Upload completed intakes and update shared spreadsheet.	1.0	\$225.00	\$225.00
10/24/2013	AKa	9	Follow-up re: wage and hour research	0.3	\$275.00	\$82.50
10/24/2013	DR	9	Review A. Karl memo on state laws for new sub-classes & provide feedback	1.2	\$350.00	\$420.00
10/24/2013	EG	3	Schedule intake calls.	0.6	\$225.00	\$135.00
10/25/2013	AKa	9	Follow-up research re: states' wage and hour law.	2.3	\$275.00	\$632.50
10/25/2013	DR	9	Review A. Karl memo on Indiana, Kentucky, & Missouri state law claims; email A. Karl & C. Worthman re same; Meeting with M. Lamy re same	1.4	\$350.00	\$490.00
10/25/2013	DR	9	Meeting with C. Worthman re new state law claims	0.4	\$350.00	\$140.00
10/25/2013	EG	3	Update shared spreadsheet.	0.9	\$225.00	\$202.50
10/29/2013	EG	3	Schedule intakes.	0.8	\$225.00	\$180.00
10/29/2013	EG	3	Update spreadsheet with new numbers.	0.9	\$225.00	\$202.50
10/29/2013	EG	3	(Michael Dockett) Intake.	1.2	\$225.00	\$270.00
10/29/2013	EG	3	(Intakes) schedule intakes.	0.3	\$225.00	\$67.50
10/29/2013	EG	3	Upload intakes to shared drive.	0.4	\$225.00	\$90.00
10/29/2013	EG	3	(Tangie Green) Intake and follow up.	0.8	\$225.00	\$180.00
10/30/2013	AKa	9	Researching state wage & hour law	0.3	\$275.00	\$82.50
10/30/2013	DR	3	Review email from M. Frandsen; review Kentucky intakes on shared drive; Meeting with C. Caprara re downloading Kentucky intakes to shared drive	0.1	\$350.00	\$35.00

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Date	Atty/	Category	Description	Time		Value
10/30/2013	DR	9	Meeting with A. Karl re memo on state law claims	0.1	\$350.00	\$35.00
10/30/2013	DR	9	Review Kentucky intake notes	0.2	\$350.00	\$70.00
10/30/2013	DR	3	Meeting with A. Karl re research memo on state laws	0.1	\$350.00	\$35.00
10/30/2013	EG	9	(Daniel Schaberg) Intake.	1.9	\$225.00	\$427.50
10/30/2013	EG	3	Update spreadsheet.	24.0	\$225.00	\$5,400.00
10/31/2013	DR	9	Review A. Karl memo & update for distribution to co-counsel	4.0	\$350.00	\$1,400.00
11/1/2013	DR	9	Emails with C. Worthman re memo on state laws	0.1	\$350.00	\$35.00
11/1/2013	DR	9	Review C. Worthman edits to memo on state law & update memo; Meeting with C. Worthman re same; email co-counsel-counsel re same	1.7	\$350.00	\$595.00
11/5/2013	DR	9	Review cases to demonstrate viability of Missouri class; Meeting with C. Worthman re same; email C. Chan re case status	0.5	\$350.00	\$175.00
11/5/2013	DR	16	Review emails from C. Chan re discovery, state law claims	0.1	\$350.00	\$35.00
11/5/2013	EG	3	Update spreadsheet.	0.6	\$225.00	\$135.00
11/5/2013	EG	3	Upload completed intakes to shared drive.	0.6	\$225.00	\$135.00
11/5/2013	EG	3	Schedule intake calls.	0.8	\$225.00	\$180.00
11/6/2013	DR	9	Review status of intakes, call to obtain Missouri and Kentucky named plaintiffs	0.5	\$350.00	\$175.00
11/6/2013	DR	9	Meeting with T. Jackson re status of case, new state law claims	0.4	\$350.00	\$140.00
11/6/2013	DR	16	Meeting with C. Worthman re status of case	0.1	\$350.00	\$35.00
11/6/2013	EG	3	Schedule intakes.	0.8	\$225.00	\$180.00
11/6/2013	EG	3	(James Kerner) Intake.	0.7	\$225.00	\$157.50
11/7/2013	DR	3	Call potential class reps in Missouri & Kentucky	1.2	\$350.00	\$420.00
11/7/2013	DR	16	Meeting with A. Romero & C. Worthman re Birch retainer; review cover letter for Birch retainer	0.1	\$350.00	\$35.00
11/7/2013	DR	9	Draft Missouri sections of complaint	2.2	\$350.00	\$770.00
11/7/2013	EG	3	Schedule intakes.	0.3	\$225.00	\$67.50
11/8/2013	DR	9	Call with B. Birch re retainer for Missouri class, facts for complaint	0.3	\$350.00	\$105.00
11/8/2013	DR	9	Review C. Worthman edits to draft Missouri sections of brief; Meeting with C. Worthman re same; input C. Worthman edits	0.7	\$350.00	\$245.00
11/8/2013	DR	9	Conference with co-counsel call re adding state claims	0.5	\$350.00	\$175.00
11/8/2013	DR	9	Meeting with C. Worthman re follow-up to conference call	0.1	\$350.00	\$35.00
11/12/2013	EG	3	Upload completed intakes to shared drive and update spreadsheet.	1.0	\$225.00	\$225.00
11/12/2013	EG	3	Schedule intakes.	0.6	\$225.00	\$135.00
11/15/2013	DR	9	Email C. Worthman, A. Jongco, T. Jackson, & A. Lah re California case settlement	0.1	\$350.00	\$35.00
11/18/2013	DR	9	Research potential Arkansas & North Dakota claims	0.8	\$350.00	\$280.00
11/19/2013	DR	16	Email T. Jackson, A. Romero re co-counsel agreement	0.1	\$350.00	\$35.00

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Date	Atty/	Category	Description	Time		Value
11/19/2013	DR	16	Meeting with T. Jackson re Birch retainer agreement; review revised co-counsel-counsel-counsel agreement; Meeting with T. Jackson & A. Romero re co-counsel-counsel agreement	0.3	\$350.00	\$105.00
11/19/2013	DR	16	Email co-counsel, A. Romero, & C. Worthman re retainer agreement, co-counsel-counsel agreement	0.2	\$350.00	\$70.00
11/19/2013	DR	9	Research applicability of Arkansas & North Dakota wage & hour law; Meeting with C. Worthman re same	4.1	\$350.00	\$1,435.00
11/19/2013	EG	3	Schedule intake calls.	1.0	\$225.00	\$225.00
11/19/2013	EG	3	Update shared spreadsheet.	0.7	\$225.00	\$157.50
11/19/2013	TJ	16	review case issues	0.8	\$700.00	\$560.00
11/20/2013	DR	9	Finalize memo on AR & ND state law claims	0.9	\$350.00	\$315.00
11/20/2013	EG	3	(Daniel Pascual) Intake.	1.3	\$225.00	\$292.50
11/20/2013	EG	3	Schedule intakes.	0.6	\$225.00	\$135.00
11/21/2013	DR	9	Call potential Arkansas and Kentucky class reps	0.9	\$350.00	\$315.00
11/22/2013	DR	16	Meeting with T. Jackson re status of case, sharing of costs, Ark. named plaintiff	0.2	\$350.00	\$70.00
11/22/2013	DR	16	Email co-counsel re update, conference call	0.1	\$350.00	\$35.00
11/22/2013	EG	3	Schedule intakes.	1.0	\$225.00	\$225.00
11/26/2013	DR	9	Call with T. Jackson re conference call scheduling, case management	0.1	\$350.00	\$35.00
11/26/2013	DR	9	Meeting with C. Worthman re memo, conference call, Meeting with T. Jackson	0.1	\$350.00	\$35.00
11/26/2013	DR	9	Meeting with C. Worthman re Ecolab call	0.1	\$350.00	\$35.00
11/26/2013	DR	9	Meeting with re memo on state law claims	0.1	\$350.00	\$35.00
11/26/2013	EG	3	Schedule intake calls.	0.6	\$225.00	\$135.00
11/26/2013	EG	3	Update shared spreadsheet.	0.6	\$225.00	\$135.00
11/27/2013	DR	9	Forward memo on Arkansas & North Dakota to co-counsel; prepare retainer for Arkansas class rep & send via email	0.6	\$350.00	\$210.00
11/27/2013	DR	9	Call with R. Birch; check intakes for Kentucky named plaintiff	0.2	\$350.00	\$70.00
11/27/2013	DR	16	Call with co-counsel re discovery, state law claims; follow-up Meeting with C. Worthman	0.6	\$350.00	\$210.00
11/27/2013	DR	16	Email copy of retainer to K. Grundkey; check Hoffman CTS tracker for North Dakota intakes	0.2	\$350.00	\$70.00
11/27/2013	DR	16	Email S. Le Boulch re cost fund	0.1	\$350.00	\$35.00
11/27/2013	DR	16	Review cover letter to B. Birch	0.2	\$350.00	\$70.00
12/3/2013	EG	3	Schedule intake calls.	1.5	\$225.00	\$337.50
12/5/2013	DR	9	Contact potential class reps	0.9	\$350.00	\$315.00
12/6/2013	DR	9	Call back from R. Stauss - potential North Dakota class rep	0.1	\$350.00	\$35.00
12/10/2013	EG	3	Schedule intakes	1.0	\$225.00	\$225.00
12/11/2013	DR	9	Call with potential class reps	0.2	\$350.00	\$70.00
12/11/2013	EG	3	schedule intakes.	1.2	\$225.00	\$270.00
12/11/2013	EG	3	(Jerry Hillyard) Intake.	1.0	\$225.00	\$225.00
12/12/2013	EG	3	(Leigh Chapman) Intake.	1.5	\$225.00	\$337.50

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Date	Atty/	Category	Description	Time	Value	Value
12/17/2013	DR	9	Email R. Nelson re Missouri & North Dakota sections of complaint	0.1	\$350.00	\$35.00
12/17/2013	DR	9	Draft Missouri and North Dakota sections of complaint	1.5	\$350.00	\$525.00
12/18/2013	DR	9	Continue to draft amended complaint; confirm edits with Missouri and North Dakota class reps	1.8	\$350.00	\$630.00
12/18/2013	DR	9	Try to obtain Kentucky and Arkansas class reps	0.9	\$350.00	\$315.00
12/19/2013	DR	9	Intra-office conference with C. Worthman re amended complaint	0.2	\$350.00	\$70.00
12/19/2013	DR	9	Finalize draft of amended complaint and send to R. Nelson	0.2	\$350.00	\$70.00
12/19/2013	DR	4	Review discovery meet and confer letters and discovery responses	0.2	\$350.00	\$70.00
12/20/2013	DR	9	Review and respond to emails re new state subclasses	0.6	\$350.00	\$210.00
12/20/2013	DR	9	Call with T. Jackson re North Dakota subclass	0.1	\$350.00	\$35.00
12/20/2013	DR	9	Email R. Nelson re potentially applicable exemptions to address in Fourth Amended Complaint	0.1	\$350.00	\$35.00
12/20/2013	TJ	9	Call with D. Ranahan and North Dakota subclass	0.1	\$700.00	\$70.00
12/27/2013	DR	9	Review 4th Amended Complaint & motion to amend in advance of conference call; review other North Dakota intakes	0.2	\$350.00	\$70.00
12/27/2013	DR	16	Team conference call; draft follow-up email to C. Worthman & T. Jackson; investigate claims against Ecolab in Kentucky and Arkansas courts as possible source of class representatives	1.2	\$350.00	\$420.00
12/27/2013	DR	9	Call North Dakota class rep re not proceeding with claim; draft & send confirmation letter re same	0.4	\$350.00	\$140.00
12/27/2013	DR	16	Distribute executed Birch retainer to team	0.1	\$350.00	\$35.00
1/6/2014	DR	16	Email A. Romero re class rep retainers; email E. Garcia re collective member interviews	0.1	\$350.00	\$35.00
1/6/2014	EG	9	Send D. Ranahan update on call project for Kentucky and Arkansas opting	0.2	\$225.00	\$45.00
1/6/2014	EG	3	Schedule intake calls	1.0	\$225.00	\$225.00
1/9/2014	DR	4	Review email re meet & confer call	0.1	\$350.00	\$35.00
1/14/2014	TJ	16	Intra-office conference with C. Worthman & D. Ranahan re case status; Intra-office conference with J. Lais re discovery	0.3	\$700.00	\$210.00
1/15/2014	EG	3	Schedule intakes	0.8	\$225.00	\$180.00
1/17/2014	DR	9	Review 4AC & motion to amend	1.7	\$350.00	\$595.00
1/22/2014	DR	16	Email Birch retainer to co-counsel; email M. Sweeney re necessity of signed co-counsel agreement	0.4	\$350.00	\$140.00
1/22/2014	DR	4	Review email re discovery meet & confer; email C. Worthman & T. Jackson re same	0.2	\$350.00	\$70.00
1/23/2014	DR	9	Email team re North Carolina workers	0.2	\$350.00	\$70.00
1/23/2014	DR	16	Intra-office conference with C. Worthman re status of case	0.1	\$350.00	\$35.00
1/27/2014	DR	9	Call with R. Nelson re North Carolina claim	0.1	\$350.00	\$35.00
1/27/2014	EG	3	Schedule intakes	0.5	\$225.00	\$112.50

EXHIBIT C
LEWIS, FEINBERG, LEE & JACKSON, P.C.

Cancilla v. Ecolab

Hours & Fees Per Task Code through 08/20/2015

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1/28/2014	DR	9	Email E. Garcia & C. Caprara re Kentucky & Arkansas class reps	0.1	\$350.00	\$35.00
1/28/2014	EG	3	Update D. Ranahan on intake progress	0.4	\$225.00	\$90.00
1/29/2014	DR	9	Review email from R. Nelson re final drafts of documents for 4AC & motion to amend	0.3	\$350.00	\$105.00
1/30/2014	DR	16	Respond to C. Chan email re group conference call; email T. Jackson & C. Worthman re same	0.1	\$350.00	\$35.00
1/31/2014	DR	16	Intra-office conference with C. Worthman re staffing & discovery; Intra-office conference with C. Worthman & T. Jackson re same and case status; Intra-office conference with J. Lais re discovery	0.5	\$350.00	\$175.00
1/31/2014	TJ	16	Intra-office conference with C. Worthman & D. Ranahan re case status; Intra-office conference with J. Lais re discovery	0.3	\$700.00	\$210.00
2/3/2014	DR	16	Team conference call re case management statement, status of case	1.0	\$350.00	\$350.00
2/3/2014	DR	16	Review / edit draft notice of appearance	0.1	\$350.00	\$35.00
2/3/2014	DR	16	Review/edit joint case management statement	0.6	\$350.00	\$210.00
2/3/2014	JLa	6	Read complaint and discuss upcoming document review with T. Jackson and D. Ranahan.	0.6	\$250.00	\$150.00
2/3/2014	TJ	16	Call and Review CMC	0.9	\$700.00	\$630.00
2/12/2014	DR	6	Intra-office conference with J. Lais re doc review project	0.1	\$350.00	\$35.00
2/12/2014	EG	3	Schedule intakes	0.8	\$225.00	\$180.00
2/12/2014	EG	3	Update intake spreadsheet	0.9	\$225.00	\$202.50
2/18/2014	DR	4	Review meet & confer letter from J. Mullan	0.1	\$350.00	\$35.00
2/19/2014	DR	10	E-mail to C. Worthman & T. Jackson re Lou v. Ma Labs opinion	0.1	\$350.00	\$35.00
2/28/2014	DR	16	Review JCMS	0.2	\$350.00	\$70.00
3/11/2014	DR	16	Intra-office conference with T. Jackson re status of case	0.1	\$350.00	\$35.00
3/21/2014	DR	9	Travel to and from hearing on motion for leave to amend	1.0	\$350.00	\$350.00
3/21/2014	DR	9	Meet with co-counsel before motion for leave to amend hearing; motion for leave to amend hearing; meet with co-counsel following hearing	1.0	\$350.00	\$350.00
3/21/2014	DR	4	Intra-office conference with T. Jackson re hearing, discovery	0.3	\$350.00	\$105.00
3/21/2014	TJ	4	Discovery and other discussion	0.3	\$700.00	\$210.00
3/24/2014	DR	16	Review emails & CMS prior to team call; team call	1.1	\$350.00	\$385.00
3/24/2014	DR	16	Email J. Mullan re California class member calls; call B. Birch re deposition	0.4	\$350.00	\$140.00
3/24/2014	TJ	16	Call and various catch up	1.3	\$700.00	\$910.00
4/3/2014	DR	4	Review amended initial disclosures	0.1	\$350.00	\$35.00
4/7/2014	DR	14	Email T. Jackson & C. Worthman re deposition date	0.1	\$350.00	\$35.00
4/8/2014	DR	14	Intra-office conference with C. Worthman re depositions	0.1	\$350.00	\$35.00
4/8/2014	DR	14	Voicemail to B. Birch re deposition date	0.1	\$350.00	\$35.00

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Cancilla v. Ecolab

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Date	Atty/	Category	Description	Time	Value	Value
4/9/2014	DR	14	Call with B. Birch re deposition dates; email J. Mullan re same	0.3	\$350.00	\$105.00
4/11/2014	DR	4	Review document requests prepared by C. Chan	0.2	\$350.00	\$70.00
4/11/2014	DR	9	Review motion to add late filed consent to suits	0.8	\$350.00	\$280.00
4/18/2014	DR	10	Review summary judgment motion from Ecolab	0.2	\$350.00	\$70.00
4/21/2014	DR	4	Review requests for production; Intra-office conference with C. Caprara re same	0.1	\$350.00	\$35.00
4/23/2014	DR	4	Review discovery requests	0.2	\$350.00	\$70.00
4/23/2014	DR	10	Review summary judgment motion, email team re same	0.2	\$350.00	\$70.00
4/24/2014	DR	4	Email team re discovery responses; email C. Caprara re same	0.3	\$350.00	\$105.00
4/25/2014	CCa	4	RFPs Comparison Spreadsheet for D. Ranahan	1.5	\$200.00	\$300.00
4/28/2014	CCa	4	RFPs Comparison Spreadsheet for D. Ranahan	2.0	\$200.00	\$400.00
4/28/2014	DR	4	Intra-office conference with C. Caprara re review of discovery requests; review C. Caprara summary of discovery requests; forward same to team	0.2	\$350.00	\$70.00
4/28/2014	DR	10	Review Motion for Summary Judgment & opposition to Motion for Summary Judgment	0.6	\$350.00	\$210.00
4/28/2014	DR	4	Team call re discovery requests	0.3	\$350.00	\$87.50
4/28/2014	DR	10	Team call re summary judgment opposition	0.3	\$350.00	\$87.50
4/28/2014	DR	16	Intra-office conference with C. Worthman re team call, discovery	0.2	\$350.00	\$70.00
4/30/2014	CCa	4	RFPs Comparison Spreadsheet for D. Ranahan	6.5	\$200.00	\$1,300.00
4/30/2014	DR	4	E-mail to C. Caprara re review of discovery requests	0.1	\$350.00	\$35.00
4/30/2014	DR	4	Review spreadsheet comparing discovery requests; call R. Birch re discovery requests	0.4	\$350.00	\$140.00
5/2/2014	DR	8	Review draft reply brief on Motion for Leave to File Additional Consents to Join	0.3	\$350.00	\$105.00
5/5/2014	DR	14	Team call re depositions	0.1	\$350.00	\$35.00
5/6/2014	TJ	16	Discuss case status and review case materials	0.8	\$700.00	\$560.00
5/7/2014	DR	4	Draft RFP response template	3.1	\$350.00	\$1,085.00
5/8/2014	TJ	16	Conference w/ J. Lewis re: strategy	0.8	\$700.00	\$560.00
5/9/2014	DR	10	Review summary judgment reply brief	0.2	\$350.00	\$70.00
5/9/2014	DR	7	Review e-mail from C. Chan re California class	0.4	\$350.00	\$140.00
5/11/2014	JL	16	Review pleadings and orders	0.6	\$900.00	\$540.00
5/12/2014	DR	7	Review e-mail from M. Frandsen re California class calls; Review e-mail from C. Caprara re same	0.1	\$350.00	\$35.00
5/12/2014	DR	4	Revise template discovery response	0.5	\$350.00	\$175.00
5/12/2014	DR	3	Review questionnaire	0.4	\$350.00	\$140.00
5/12/2014	DR	16	Review e-mail from J. Finberg re status of case; E-mail to J. Lewis re same	0.1	\$350.00	\$35.00
5/12/2014	DR	4	Intra-office conference with J. Lewis re discovery responses, status of case	0.1	\$350.00	\$35.00
5/12/2014	DR	4	Look up question of possession, custody, or control for multiple plaintiffs; amend discovery responses	1.3	\$350.00	\$455.00
5/12/2014	JL	4	Review and edit discovery response template	0.3	\$900.00	\$270.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.

Cancilla v. Ecolab

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Date	Atty/	Category	Description	Time	Value	Value
5/13/2014	DR	4	Finalize discovery response and distribute to team	0.8	\$350.00	\$280.00
5/13/2014	JL	4	Review and respond to e-mails re discovery requests and responses	0.1	\$900.00	\$90.00
5/13/2014	JL	4	E-mails re depositions	0.1	\$900.00	\$90.00
5/16/2014	DR	4	E-mail to A. Guerra re discovery response	0.2	\$350.00	\$70.00
5/19/2014	DR	4	Review e-mail from J. Mullan re discovery responses	0.1	\$350.00	\$35.00
5/19/2014	DR	4	Review e-mail from C. Chan re document production	0.1	\$350.00	\$35.00
5/19/2014	DR	4	E-mail to team re document production	0.1	\$350.00	\$35.00
5/19/2014	DR	4	E-mail to team re discovery responses	0.1	\$350.00	\$35.00
5/20/2014	DR	14	E-mail to J. Mullan re deposition date	0.1	\$350.00	\$35.00
5/20/2014	DR	4	E-mail to R. Nelson re discovery responses	0.2	\$350.00	\$70.00
5/20/2014	DR	4	Respond to emails from C. Chan & A. Guerra re RFP responses; call R. Nelson re same	0.6	\$350.00	\$210.00
5/20/2014	DR	3	E-mail to C. Caprara re CA class member calls	0.1	\$350.00	\$35.00
5/21/2014	DR	4	Finalize discovery responses for service	4.0	\$350.00	\$1,400.00
5/21/2014	DR	16	Intra-office conference with J. Lewis re status of the case, Friday team call; Review e-mail from J. Mullan re deposition dates; look up deposition locations	0.8	\$350.00	\$280.00
5/21/2014	DR	16	Intra-office conference with E. Garcia re case staffing; Intra-office conference with J. Lais re same	0.2	\$350.00	\$70.00
5/21/2014	DR	14	E-mail to J. Lewis re deposition locations	0.1	\$350.00	\$35.00
5/21/2014	EG	3	Schedule intakes	0.5	\$225.00	\$112.50
5/21/2014	EG	3	(Brad Durnham) Intake and follow	0.6	\$225.00	\$135.00
5/21/2014	JL	16	Intra-office conference with D. Ranahan re case status, schedule; division of labor; e-mails among, with, and from co-counsel	0.6	\$900.00	\$540.00
5/21/2014	JL	4	Discuss discovery response issue with D. Ranahan	0.1	\$900.00	\$90.00
5/22/2014	DR	4	E-mail to C. Chan & J. Mullan re document list	0.1	\$350.00	\$35.00
5/22/2014	DR	4	Calendar RFP responses; review RFP and interrogatory responses	0.2	\$350.00	\$70.00
5/23/2014	DR	16	Intra-office conference with J. Lewis re conference call	0.1	\$350.00	\$35.00
5/23/2014	DR	16	Team call	1.1	\$350.00	\$385.00
5/23/2014	DR	7	Intra-office conference with J. Tremblay re class cert brief	0.3	\$350.00	\$105.00
5/23/2014	DR	4	Telephone call to M. Sweeney re Jennison & Emanuel docs	0.1	\$350.00	\$35.00
5/23/2014	JL	16	Conference call with co-counsel	1.2	\$900.00	\$1,080.00
5/23/2014	JT	16	Conference call with EcoLab team.	1.2	\$275.00	\$330.00
5/23/2014	JT	7	Reviewed briefs in Farmers case in preparation for the Washington state claims portion of the multi-state brief for class certification.	1.2	\$275.00	\$330.00
5/23/2014	JT	7	Reviewed FLSA conditional class cert case law.	0.2	\$275.00	\$55.00
5/23/2014	JT	7	Review case file in connection with class certification	0.9	\$275.00	\$247.50
5/27/2014	EG	3	Send Molly status update	0.2	\$225.00	\$45.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	
5/27/2014	JT	10	Email from Darin re: Washington state law research.	0.2	\$275.00	\$55.00
6/5/2014	JL	16	Review numerous e-mails; reply to some; review deposition schedule	0.3	\$900.00	\$270.00
6/9/2014	DR	4	E-mail to team re template responses	0.1	\$350.00	\$35.00
6/9/2014	JT	10	WA state wage & hour research.	2.5	\$275.00	\$687.50
6/10/2014	DR	4	Review template discovery responses	3.9	\$350.00	\$1,365.00
6/10/2014	DR	4	Review Birch documents for production	0.5	\$350.00	\$175.00
6/10/2014	JT	10	Research WA state law issues.	1.6	\$275.00	\$440.00
6/11/2014	DR	9	Intra-office conference with J. Tremblay re Washington claims	0.1	\$350.00	\$35.00
6/11/2014	DR	4	Review J. Lewis revisions to template RFP response; Intra-office conference with J. Lewis re Birch documents; E-mail to team re same	1.2	\$350.00	\$420.00
6/11/2014	DR	14	Review e-mail from J. Lewis re depo defense; E-mail to team re depo defense	0.3	\$350.00	\$105.00
6/11/2014	JL	4	Edit draft discovery response template	0.7	\$900.00	\$630.00
6/11/2014	JT	10	Discussed WA state issues for brief with Darin Ranahan.	0.1	\$275.00	\$27.50
6/12/2014	DR	10	E-mail to J. Lewis re summary judgment hearing	0.1	\$350.00	\$35.00
6/13/2014	DR	4	Review e-mail from J. Sherwood re doc production	0.1	\$350.00	\$35.00
6/13/2014	DR	4	Review e-mail from J. Mullan re discovery responses	0.1	\$350.00	\$35.00
6/16/2014	DR	4	Review e-mail from team re discovery responses; E-mail to C. Caprara re discovery responses; E-mail to A. Guerra & S. Abramson re discovery responses	0.6	\$350.00	\$210.00
6/16/2014	DR	4	Finalize RFP responses	0.7	\$350.00	\$245.00
6/16/2014	JL	4	Review numerous e-mails about discovery; reply to one	0.2	\$900.00	\$180.00
6/17/2014	DR	14	E-mail to team re deposition preparation; Intra-office conference with K. Scott re same	0.4	\$350.00	\$140.00
6/17/2014	DR	4	E-mail to J. Mullan re production of invoices	0.1	\$350.00	\$35.00
6/17/2014	DR	4	E-mail to team re missing document production	0.1	\$350.00	\$35.00
6/18/2014	DR	4	E-mail team re document production	0.9	\$350.00	\$315.00
6/18/2014	DR	14	E-mail team re deposition preparation	0.9	\$350.00	\$315.00
6/18/2014	DR	4	E-mail to C. Caprara re Jennison docs	0.1	\$350.00	\$35.00
6/18/2014	DR	4	E-mail to to co-counsel-counsel re Emanuel RFP response; E-mail to C. Caprara re same	0.1	\$350.00	\$35.00
6/18/2014	JL	4	Review numerous emails about discovery	0.1	\$900.00	\$90.00
6/18/2014	JL	14	Review deposition defense preparation materials; e-mails re same	0.3	\$900.00	\$270.00
6/19/2014	DR	14	Intra-office conference with J. Tremblay re deposition transcript review	0.1	\$350.00	\$35.00
6/19/2014	DR	10	E-mail to C. Chan re Washington research	0.1	\$350.00	\$35.00
6/19/2014	DR	14	Review e-mail from S. Lerner re Emanuel & Jarvis documents	0.1	\$350.00	\$35.00
6/19/2014	DR	14	E-mail to C. Caprara re depo prep DVDs	0.1	\$350.00	\$35.00
6/19/2014	DR	10	Review e-mail from C. Chan re Washington state research	0.1	\$350.00	\$35.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	Value
6/19/2014	DR	4	Review e-mail from C. Chan & J. Finberg re discovery responses	0.1	\$350.00	\$35.00
6/19/2014	DR	14	Review & edit draft letters from C. Caprara to co-counsel & Birch re depo prep	0.2	\$350.00	\$70.00
6/23/2014	DR	14	Review e-mail from J. Mullan re deposition	0.1	\$350.00	\$35.00
6/23/2014	JT	14	Reviewing deposition transcripts to create outline.	3.5	\$275.00	\$962.50
6/24/2014	DR	4	Review e-mail from team re objections to documents	0.1	\$350.00	\$35.00
6/24/2014	JL	5	Review e-mails re depositions	0.2	\$900.00	\$180.00
6/24/2014	JL	4	E-mails re discovery issues	0.1	\$900.00	\$90.00
6/25/2014	DR	16	Review e-mail from J. Mullan re deposition schedule; Intra-office conference with J. Lewis re same	0.1	\$350.00	\$35.00
6/25/2014	JL	5	Review further e-mails about 30(b)(6) deposition; Review notice	0.2	\$900.00	\$180.00
6/25/2014	JT	14	Deposition outline.	1.8	\$275.00	\$495.00
6/26/2014	DR	6	Review e-mail from R. Nelson re document production; E-mail to C. Caprara re same	0.2	\$350.00	\$70.00
6/26/2014	JT	14	Deposition outline.	6.4	\$275.00	\$1,760.00
6/27/2014	DR	6	Review document production; E-mail to team re production of invoices; Review e-mail from J. Mullan & S. Abrahamson re same	0.5	\$350.00	\$175.00
6/27/2014	DR	16	E-mails to support staff re document Bates stamping	0.1	\$350.00	\$35.00
6/27/2014	DR	14	Review J. Tremblay outline of deposition questions	0.3	\$350.00	\$105.00
6/30/2014	DR	4	Review e-mail from team re discovery requests; E-mail to Z. McCoy re same; E-mail to team re same	0.8	\$350.00	\$280.00
6/30/2014	DR	10	Review order on summary judgment motion	0.2	\$350.00	\$70.00
6/30/2014	JT	14	Incorporating potential objections into deposition outline.	0.3	\$275.00	\$82.50
7/1/2014	DR	16	Review e-mail from A. Guerra re access to Google Drive; invite A. Guerra to Google Drive	0.1	\$350.00	\$35.00
7/2/2014	JL	16	E-mails with co-counsel re assorted issues	0.1	\$900.00	\$90.00
7/3/2014	DR	6	Review e-mail from co-counsel re document production; review e-mail from J. Lewis re same; e-mail to J. Lewis re same; review e-mail from J. Lewis re team call	0.1	\$350.00	\$35.00
7/3/2014	JL	16	Review e-mail from co-counsel re discovery issue; send emails re same	0.2	\$900.00	\$180.00
7/7/2014	DR	5	Call with J. Finberg, J. Mullan, & J. Lewis re 30(b)(6) depositions, document production	0.4	\$350.00	\$140.00
7/7/2014	DR	4	E-mail to S. Abrahamson re document production	0.1	\$350.00	\$35.00
7/7/2014	DR	14	E-mail to Z. McCoy & Z. Helstrom re deposition transcripts & exhibits for J. Lewis	0.1	\$350.00	\$35.00
7/7/2014	JL	16	Prepare for and have call with co-counsel re deposition and other strategy issues	0.6	\$900.00	\$540.00
7/8/2014	DR	4	Review e-mail from S. Abrahamson re document production; e-mail to team re same	0.2	\$350.00	\$70.00
7/8/2014	DR	14	Review binder of deposition transcripts	0.2	\$350.00	\$70.00
7/8/2014	DR	4	Download files from co-counsel for production	0.2	\$350.00	\$70.00

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Date	Atty/	Category	Description	Time	Value	Value
7/8/2014	DR	7	E-mail to J. Lewis, J. Tremblay & co-counsel re draft Rule 23 brief	0.1	\$350.00	\$35.00
7/8/2014	JL	4	Review numerous e-mails among co-counsel re documents and depositions	0.1	\$900.00	\$90.00
7/9/2014	DR	4	Review e-mail from co-counsel re documents to produce; e-mail to Z. McCoy re same	0.1	\$350.00	\$35.00
7/14/2014	JL	6	Review and analyze documents	1.7	\$900.00	\$1,530.00
7/15/2014	DR	4	E-mail to co-counsel re Rader docs	0.1	\$350.00	\$35.00
7/15/2014	DR	14	Voicemail to deponents re deposition preparation	0.1	\$350.00	\$35.00
7/15/2014	DR	5	Review deposition outline prepared by J. Tremblay	1.6	\$350.00	\$560.00
7/15/2014	JL	16	Review several e-mails about discovery and claims; e-mail re trainees claims	0.1	\$900.00	\$90.00
7/15/2014	JL	6	Review 30(b)(6) deposition transcripts	1.3	\$900.00	\$1,170.00
7/15/2014	JL	10	Review pleadings and relevant authorities	1.1	\$900.00	\$990.00
7/16/2014	DR	14	Call with J. Kauffman re depo defense; E-mail to C. Caprara re same	0.6	\$350.00	\$210.00
7/16/2014	JT	14	Edits to depo prep outline	3.8	\$275.00	\$1,045.00
7/17/2014	DR	14	Call with J. Singer re deposition preparation	0.2	\$350.00	\$70.00
7/17/2014	DR	14	E-mail to J. Singer re deposition preparation	0.1	\$350.00	\$35.00
7/17/2014	JL	5	Review draft 30(b)(6) deposition outline	0.4	\$900.00	\$360.00
7/17/2014	JT	14	Preparing list of defense deposition exhibits.	2.2	\$275.00	\$605.00
7/18/2014	DR	5	Review e-mail from J. Lewis re depo outline	0.1	\$350.00	\$35.00
7/18/2014	JL	5	E-mail to co-counsel re depositions	0.1	\$900.00	\$90.00
7/18/2014	JL	10	Review summary judgment papers to analyze issues; e-mail re same	0.5	\$900.00	\$450.00
7/18/2014	JL	5	Review and suggest edits to deposition outline	1.5	\$900.00	\$1,350.00
7/18/2014	JL	9	Review and respond to e-mail regarding possible trainee plaintiff	0.1	\$900.00	\$90.00
7/18/2014	JT	5	Adding exhibits to deposition outline.	3.4	\$275.00	\$935.00
7/21/2014	DR	14	E-mail to C. Caprara re travel arrangements	0.1	\$350.00	\$35.00
7/21/2014	DR	14	Revise letter to Kauffman re depo prep; draft letter to Birch; e-mail to C. Caprara re travel arrangements	0.6	\$350.00	\$210.00
7/22/2014	DR	14	Review J. Tremblay deposition prep outline	0.9	\$350.00	\$315.00
7/23/2014	DR	16	E-mail to J. Lewis re listserv; e-mail to A. Niehaus re same	0.1	\$350.00	\$35.00
7/23/2014	DR	5	Review e-mail from J. Finberg re 30(b)(6) depositions	0.1	\$350.00	\$35.00
7/23/2014	JL	5	Review memos and e-mails about depositions; review and respond to e-mail from J. Finberg	0.2	\$900.00	\$180.00
7/23/2014	JL	5	Review e-mail from co-counsel with summary of 30(b)(6) deposition testimony; send e-mail re same	0.2	\$900.00	\$180.00
7/24/2014	JL	3	Review e-mail re trainees, intake form	0.1	\$900.00	\$90.00
7/25/2014	DR	16	Call with co-counsel	1.0	\$350.00	\$350.00
7/25/2014	JL	16	Strategy call with co-counsel	1.0	\$900.00	\$900.00
7/25/2014	JL	16	Intra-office conference with T. Jackson, D. Ranahan	0.2	\$900.00	\$180.00
7/25/2014	JL	10	Legal Research re summary judgment effect; e-mail to team about it; assign to summer associate	0.5	\$900.00	\$450.00
7/25/2014	JL	16	Work on revised proposed agreement	0.5	\$900.00	\$450.00

EXHIBIT C
LEWIS, FEINBERG, LEE & JACKSON, P.C.
Cancilla v. Ecolab

Hours & Fees Per Task Code through 08/20/2015

Date	Atty/	Category	Description	Time	Value	Value
7/27/2014	DR	14	Review and organize documents to prepare for depositions of Birch and Kaufmann	1.4	\$350.00	\$490.00
7/27/2014	JL	7	Review draft class cert brief	0.5	\$900.00	\$450.00
7/28/2014	DR	14	Travel to St. Louis for Birch & Kaufmann depositions; review Birch and Kaufmann personnel files while en route; review depo prep outline while en route	10.0	\$350.00	\$3,500.00
7/28/2014	DR	14	Continue to review Kaufmann personnel file	0.8	\$350.00	\$280.00
7/28/2014	DR	14	E-mail to C. Caprara re Jarvis & Birch documents for production	0.1	\$350.00	\$35.00
7/28/2014	JL	16	Strategy call with co-counsel	0.4	\$900.00	\$360.00
7/28/2014	JT	10	Research on re-raising a partial summary judgment ruling when a final judgment has not yet been entered.	1.3	\$275.00	\$357.50
7/29/2014	DR	14	Birch and Kaufmann depo prep meetings	7.2	\$350.00	\$2,520.00
7/30/2014	DR	14	Travel to Birch and Kaufmann depositions; meet with clients before depositions; depositions of Birch and Kaufmann; travel back to Oakland from St. Louis	11.7	\$350.00	\$4,095.00
7/30/2014	JL	16	Review numerous e-mails among co-counsel	0.2	\$900.00	\$180.00
7/30/2014	JL	16	Edit draft case management conference statement	0.3	\$900.00	\$270.00
7/31/2014	JL	16	Review revised draft of CMS; e-mails among counsel	0.2	\$900.00	\$180.00
8/1/2014	JT	10	Researching motions to reconsider and other alternative vehicles to request the court re-examine is ruling on willfulness.	1.2	\$275.00	\$330.00
8/6/2014	DR	14	E-mail to C. Caprara re deposition transcripts	0.2	\$350.00	\$70.00
8/6/2014	DR	16	Review Case Management Statement; Intra-office conference with J. Lewis re same	1.0	\$350.00	\$350.00
8/6/2014	JL	16	Review case management statement draft; edit	0.4	\$900.00	\$360.00
8/6/2014	JL	16	Review further changes to CMS	0.1	\$900.00	\$90.00
8/7/2014	JL	16	Review revised proposed CMS and e-mail re same	0.1	\$900.00	\$90.00
8/7/2014	JL	14	E-mails about depositions	0.1	\$900.00	\$90.00
8/15/2014	DR	16	Intra-office conference with J. Lewis re case management conference	0.1	\$350.00	\$35.00
8/15/2014	JL	16	Travel time to, appear at, and return from CMC	2.3	\$900.00	\$2,070.00
8/21/2014	JL	7	Review second draft of class cert motion	1.2	\$900.00	\$1,080.00
8/22/2014	DR	7	Review draft class cert brief	0.1	\$350.00	\$35.00
8/25/2014	DR	14	Call J. Kaufmann re corrections to depo transcript; Intra-office conference with J. Lewis re same	0.3	\$350.00	\$105.00
8/26/2014	DR	16	Intra-office conference with T. Jackson re case status, conference call	0.1	\$350.00	\$35.00
8/26/2014	TJ	16	Intra-office conference with D. Ranahan re case status, conference call	0.1	\$700.00	\$70.00
8/27/2014	DR	16	Team call	0.4	\$350.00	\$140.00
8/27/2014	DR	7	E-mail to office re adequacy declaration; review exemplars provided by C. Worthman & D. Feinberg	0.2	\$350.00	\$70.00
9/1/2014	DR	3	Review e-mail from opt-in re mileage reimbursement	0.1	\$350.00	\$35.00
9/2/2014	DR	3	E-mail to T. Jackson re reimbursement for mileage	0.1	\$350.00	\$35.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	Value
9/2/2014	DR	14	E-mail to J. Mullan & J. Finberg re cost reimbursement	0.1	\$350.00	\$35.00
9/2/2014	DR	7	Prepare adequacy declaration and insert citations to class cert brief	1.3	\$350.00	\$455.00
9/3/2014	DR	7	Review Birch transcript for insertions to class cert brief	1.2	\$350.00	\$420.00
9/4/2014	DR	7	Fill in information for class cert opposition	1.7	\$350.00	\$595.00
9/4/2014	TJ	7	Declaration and class cert materials	0.8	\$700.00	\$560.00
9/5/2014	DR	7	Finalize adequacy declaration; E-mail to C. Chan with depo cites; Intra-office conference with T. Jackson re same	2.0	\$350.00	\$700.00
9/5/2014	DR	14	E-mail to J. Kaufmann & co-counsel re reimbursement	0.1	\$350.00	\$35.00
9/15/2014	DR	14	E-mail to C. Chan re deposition preparation	0.1	\$350.00	\$35.00
10/3/2014	DR	16	Review Jarvis retainer; E-mail to co-counsel re same; E-mail to T. Jackson & Z. Helstrom re same	0.1	\$350.00	\$35.00
10/6/2014	JL	8	E-mails re motion to dismiss; review information about arbitration agreement	0.2	\$900.00	\$180.00
10/7/2014	JL	16	Conference call with co-counsel	0.3	\$900.00	\$270.00
10/8/2014	JL	14	Review and respond to e-mail regarding arbitration agreement; review it	0.2	\$900.00	\$180.00
10/8/2014	JL	14	Review further e-mails re arbitration agreement	0.1	\$900.00	\$90.00
10/9/2014	JL	8	Review draft opposition to motion to dismiss	0.6	\$900.00	\$540.00
10/15/2014	DR	14	Call B. Birch re arbitration agreement	0.3	\$350.00	\$105.00
10/22/2014	DR	7	E-mail to J. Lewis re adequacy declaration, class certification	0.1	\$350.00	\$35.00
10/22/2014	DR	7	Intra-office conference with J. Lewis re adequacy declaration	0.1	\$350.00	\$35.00
10/22/2014	JL	7	Review and suggest edit to motion and order re class cert; Review co-counsel's declaration	0.3	\$900.00	\$270.00
10/22/2014	JL	7	Edit class cert brief	0.9	\$900.00	\$810.00
10/22/2014	JL	7	Work on class certification declaration	0.3	\$900.00	\$270.00
10/22/2014	JL	7	Further work on class certification brief, declaration	0.5	\$900.00	\$450.00
10/23/2014	DR	7	Revise adequacy declaration for class cert per feedback from J. Lewis	2.0	\$350.00	\$700.00
10/24/2014	DR	7	Finalize adequacy declaration & E-mail to team	0.9	\$350.00	\$315.00
11/11/2014	JL	16	Review e-mails with opposing counsel	0.1	\$900.00	\$90.00
11/12/2014	JL	16	E-mails re dismissed plaintiff	0.2	\$900.00	\$180.00
11/14/2014	JL	7	Numerous e-mails re class member	0.2	\$900.00	\$180.00
11/20/2014	JL	16	Review draft complaint for Michaud	0.4	\$900.00	\$360.00
12/2/2014	JL	16	Edit stipulation	0.1	\$900.00	\$90.00
12/2/2014	JL	16	Review and respond to e-mails re stipulation	0.1	\$900.00	\$90.00
12/5/2014	JL	16	Review several e-mails from co-counsel	0.1	\$900.00	\$90.00
12/8/2014	DR	7	Review class cert opposition	0.6	\$350.00	\$210.00
12/8/2014	DR	16	Review e-mails from team re scheduling conference call; E-mail to J. Lewis re same	0.1	\$350.00	\$35.00
12/8/2014	JL	16	E-mails from co-counsel, opposing counsel	0.1	\$900.00	\$90.00
12/9/2014	DR	16	Calendar team call	0.1	\$350.00	\$35.00
12/9/2014	JL	7	Review defendants' opposition to class certification	0.4	\$900.00	\$360.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	
12/10/2014	DR	7	Team call re class cert opposition	0.6	\$350.00	\$210.00
12/10/2014	DR	7	Look up Wisconsin law from class cert opposition	0.5	\$350.00	\$175.00
12/10/2014	JL	7	Call with co-counsel to analyze defendants' class cert opposition and plan reply	0.6	\$900.00	\$540.00
12/11/2014	DR	7	E-mail to J. Lewis re Wisconsin law; E-mail to team re same	0.6	\$350.00	\$210.00
12/11/2014	JL	7	Review e-mail re Wisconsin law; reply to it; Review email from D. Ranahan to co-counsel re same	0.1	\$900.00	\$90.00
12/16/2014	JL	7	Review and respond to e-mail re client's firing	0.1	\$900.00	\$90.00
12/18/2014	DR	8	Review e-mail from team re decert motion; E-mail to J. Lewis re same	0.1	\$350.00	\$35.00
12/18/2014	JL	8	E-mails re defendants' motion to decertify FLSA claim	0.2	\$900.00	\$180.00
12/19/2014	JL	16	Conference call with co-counsel re motions	0.5	\$900.00	\$450.00
12/19/2014	JL	10	E-mails re briefing schedule, summary judgment motion	0.1	\$900.00	\$90.00
1/6/2015	DR	10	Review Motion for Summary Judgment; E-mail to J. Lewis re same; calendar call re same	0.2	\$350.00	\$70.00
1/7/2015	DR	10	Review Motion for Summary Judgment	1.5	\$350.00	\$525.00
1/7/2015	DR	10	Conference call re Motion for Summary Judgment	0.8	\$350.00	\$280.00
1/7/2015	DR	10	Intra-office conference with J. Lewis re conference call, next steps	0.1	\$350.00	\$35.00
1/7/2015	DR	10	Look up Illinois wage and hour law; E-mail to A. Lah re law clerk assignment re same	0.1	\$350.00	\$35.00
1/7/2015	JL	10	Intra-office conference with D. Ranahan re motions	0.1	\$900.00	\$90.00
1/14/2015	DR	10	Intra-office conference with J. Tremblay re Illinois research; conduct follow-up research; E-mail to J. Lewis re same	1.5	\$350.00	\$525.00
1/14/2015	JL	10	Review research memo on Illinois law; e-mail to D. Ranahan re same	0.2	\$900.00	\$180.00
1/14/2015	JT	10	Discussed Illinois portion of opposition to summary judgment motion assignment with Darin Ranahan.	0.1	\$275.00	\$27.50
1/14/2015	JT	10	Researching Illinois portion of opposition to defendant's motion for summary judgment.	1.7	\$275.00	\$467.50
1/14/2015	JT	10	Drafting email to Darin re: opposition to defendant's MSJ with respect to IWPCA claims.	1.2	\$275.00	\$330.00
1/14/2015	JT	10	Drafting footnote conceding IWPCA claim.	0.4	\$275.00	\$110.00
1/15/2015	DR	10	Draft motion for leave to file motion for reconsideration re willfulness	4.9	\$350.00	\$1,715.00
1/15/2015	JL	10	Analysis of e-mails re Illinois claims, motion to reconsider	0.2	\$900.00	\$180.00
1/15/2015	TJ	10	Edit opposition to MSJ	0.8	\$700.00	\$560.00
1/16/2015	DR	10	Draft Motion for Summary Judgment section on Illinois law; E-mail to team re same	2.0	\$350.00	\$700.00
1/16/2015	JL	8	Review e-mail from opposing counsel re Michaud firing; e-mails with co-counsel re same	0.1	\$900.00	\$90.00
1/20/2015	DR	10	Review e-mail from opposing counsel re exhibits to Motion for Summary Judgment opposition; E-mail to team re same	0.4	\$350.00	\$140.00
1/20/2015	JL	10	Review e-mails from opposing counsel, co-counsel	0.1	\$900.00	\$90.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	Value
1/21/2015	DR	10	Draft e-mail to J. Mullan & J. Finberg re motion for leave to file motion for reconsideration	1.1	\$350.00	\$385.00
1/21/2015	DR	10	Intra-office conference with T. Jackson re motion for reconsideration; E-mail to co-counsel re same	0.5	\$350.00	\$175.00
1/22/2015	DR	10	Intra-office conference with T. Jackson re motion for reconsideration; Voicemail to J. Finberg re same	0.1	\$350.00	\$35.00
1/22/2015	DR	16	Review recusal order; E-mail to LFLRJ team re same	0.1	\$350.00	\$35.00
2/2/2015	DR	16	Intra-office conference with T. Jackson re team call; Intra-office conference with J. Lewis re same	0.1	\$350.00	\$35.00
2/3/2015	DR	10	Team call	0.4	\$350.00	\$140.00
2/3/2015	DR	10	Follow-up email to team call to T. Jackson & J. Lewis; research Donato wage and hour opinions	0.8	\$350.00	\$280.00
2/10/2015	JL	16	Review draft CMS	0.1	\$900.00	\$90.00
3/5/2015	JL	7	Review and respond to e-mail re plaintiff	0.1	\$900.00	\$90.00
3/16/2015	DR	16	Team call	0.4	\$350.00	\$140.00
3/16/2015	DR	16	Intra-office conference with T. Jackson re case update	0.1	\$350.00	\$35.00
3/16/2015	JL	11	Review and respond to e-mails from co-counsel and opposing counsel re mediators	0.1	\$900.00	\$90.00
3/25/2015	JL	14	Review and respond to e-mail from co-counsel re deposition defense	0.1	\$900.00	\$90.00
3/31/2015	DR	4	Review letter from co-counsel; Intra-office conference with J. Lewis re same	0.6	\$350.00	\$210.00
3/31/2015	JL	4	Review draft letter to opposing counsel and emails among co-counsel re same	0.2	\$900.00	\$180.00
3/31/2015	JL	4	E-mails re draft letter to opposing counsel	0.4	\$900.00	\$360.00
4/3/2015	JL	16	Review e-mail from co-counsel re new 7th Circuit decision	0.1	\$900.00	\$90.00
4/6/2015	JL	16	Review correspondence with opposing counsel re deadlines; Review and respond to e-mail from co-counsel re same	0.2	\$900.00	\$180.00
4/8/2015	TJ	16	Intra-office conference with D. Ranahan	0.1	\$700.00	\$70.00
4/9/2015	DR	13	Telephone call from E. Cervantez re damages work-up	0.4	\$350.00	\$140.00
4/9/2015	DR	13	Prepare spreadsheet of different claims & categories of damages	0.4	\$350.00	\$140.00
4/10/2015	DR	13	Continue preparation of damages chart for expert	2.2	\$350.00	\$770.00
4/10/2015	JL	14	Review several e-mails among co-counsel; Review and respond to e-mail from D. Ranahan	0.1	\$900.00	\$90.00
4/13/2015	DR	13	Continue preparing analysis to share with expert	1.8	\$350.00	\$630.00
4/14/2015	DR	13	E-mail to E. Cervantez re state law issues; update table with research	5.4	\$350.00	\$1,890.00
4/14/2015	DR	13	Additional emails to E. Cervantez & J. Mullan re state law issues	0.5	\$350.00	\$175.00
4/14/2015	JL	13	Review D. Ranahan e-mail re expert calculations for mediation; e-mail to him re same	0.2	\$900.00	\$180.00
4/15/2015	DR	13	Review e-mails from E. Cervantez & J. Mullan re expert; E-mail to E. Cervantez & J. Mullan re same	0.8	\$350.00	\$280.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	Value
4/16/2015	DR	13	E-mail to team re state law issues; E-mail to E. Cervantez re same; E-mail to C. Caprara re documents for review	1.8	\$350.00	\$630.00
4/16/2015	DR	13	Telephone call from E. Cervantez re mediation damages figure	0.8	\$350.00	\$280.00
4/16/2015	DR	13	Review e-mail from J. Mullan re calculating regular rate of pay	0.1	\$350.00	\$35.00
4/16/2015	DR	13	Update chart on state law issues	3.1	\$350.00	\$1,085.00
4/17/2015	DR	13	Review emails with team re expert calculations; E-mail to team re expert calculations; Telephone call from E. Cervantez re same; Telephone call to A. Burr re same	2.5	\$350.00	\$875.00
4/17/2015	DR	13	Complete back-of-the-napkin damages analysis.	1.0	\$350.00	\$350.00
4/18/2015	DR	13	Revise damages estimate	0.8	\$350.00	\$280.00
4/20/2015	DR	13	E-mail to E. Cervantez re damages estimate, lodestar; E-mail to team re same	0.2	\$350.00	\$70.00
4/20/2015	DR	11	Intra-office conference with T. Jackson & J. Lewis re status of case, mediation	0.3	\$350.00	\$105.00
4/20/2015	DR	13	Revise estimated calculations, E-mail to E. Cervantez & J. Mullan re same; review Ladore settlement calculations	1.3	\$350.00	\$455.00
4/20/2015	JL	11	Discuss settlement strategy with D. Ranahan and T. Jackson	0.3	\$900.00	\$270.00
4/20/2015	JL	16	Review order, e-mails re same	0.1	\$900.00	\$90.00
4/20/2015	TJ	16	Intra-office conference with D. Ranahan & J. Lewis re status of case, mediation	0.3	\$700.00	\$210.00
4/21/2015	DR	11	Review and respond to e-mails from E. Cervantez re mediation	1.7	\$350.00	\$595.00
4/21/2015	DR	11	E-mail to team re Birch availability for mediation; Telephone call to Birch re same	0.3	\$350.00	\$105.00
4/21/2015	DR	14	Review Michaud transcript	0.3	\$350.00	\$105.00
4/21/2015	DR	16	Review stipulation; E-mail to J. Mullan re same	0.2	\$350.00	\$70.00
4/22/2015	DR	11	Draft mediation demand	0.6	\$350.00	\$210.00
4/23/2015	DR	11	Mediation demand	0.7	\$350.00	\$245.00
4/23/2015	DR	13	Call from expert re damages calculations; E-mail to team re same	1.0	\$350.00	\$350.00
4/24/2015	DR	13	Conference call with D. Breshears, J. Finberg & J. Mullan re expert report	0.6	\$350.00	\$210.00
4/24/2015	DR	13	E-mail to D. Breshears re protective order	0.1	\$350.00	\$35.00
4/24/2015	DR	13	E-mail to team re Michaud hours	0.1	\$350.00	\$35.00
4/24/2015	DR	11	Mediation demand	3.4	\$350.00	\$1,190.00
4/27/2015	DR	11	Mediation demand	4.2	\$350.00	\$1,470.00
4/27/2015	JLa	11	Prepare fee and cost report for D. Ranahan in preparation for settlement/mediation demand.	1.1	\$250.00	\$275.00
4/28/2015	DR	13	Review e-mail from D. Breshears re protective order; E-mails with C. Caprara re sending docs	0.4	\$350.00	\$140.00
4/28/2015	DR	11	Review mediation demand; send to co-counsel	0.4	\$350.00	\$140.00
4/28/2015	DR	11	Calculate lodestar exposure; E-mail to co-counsel re same	0.4	\$350.00	\$140.00
4/28/2015	JL	11	Review mediation brief draft	0.1	\$900.00	\$90.00

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LEWIS, FEINBERG, LEE & JACKSON, P.C.**Cancilla v. Ecolab****Hours & Fees Per Task Code through 08/20/2015**

Date	Atty/	Category	Description	Time	Value	Value
4/29/2015	DR	13	Review calculations from D. Kakigi; E-mail to team re same	0.4	\$350.00	\$140.00
4/29/2015	DR	11	Review e-mail from J. Lewis re lodestar; E-mail to co-counsel re same	0.9	\$350.00	\$315.00
4/29/2015	DR	11	Revise mediation demand and send to co-counsel	1.0	\$350.00	\$350.00
4/29/2015	JL	11	Review damages and fee issues, e-mails, etc.	0.2	\$900.00	\$180.00
4/30/2015	DR	11	Call with co-counsel re mediation demand	0.6	\$350.00	\$210.00
4/30/2015	DR	11	Revise mediation demand	2.5	\$350.00	\$875.00
4/30/2015	DR	13	Call with D. Breshears re damages estimate	1.0	\$350.00	\$350.00
4/30/2015	JL	11	Conference with co-counsel re settlement demand	0.6	\$900.00	\$540.00
5/1/2015	DR	11	Review e-mail from J. Mullan re mediation demand; revise mediation demand with feedback from co-counsel; E-mail to team re mediation demand; send out mediation demand	4.1	\$350.00	\$1,435.00
5/1/2015	JL	11	Review e-mail from Darin to co-counsel	0.1	\$900.00	\$90.00
5/4/2015	DR	11	Look up NY liquidated damages issue	1.0	\$350.00	\$350.00
5/5/2015	DR	11	E-mail to team re New York class	0.7	\$350.00	\$245.00
5/5/2015	JL	11	Review several emails among counsel regarding forthcoming mediation and damages; reply to some	0.3	\$900.00	\$270.00
5/6/2015	DR	13	E-mail to team re Steward; Intra-office conference with C. Worthman re same	1.3	\$350.00	\$455.00
5/6/2015	JL	13	Review and respond to e-mail from co-counsel	0.1	\$900.00	\$90.00
5/6/2015	JL	13	Further e-mails re expert	0.1	\$900.00	\$90.00
5/7/2015	DR	13	E-mail to team re Steward call; E-mail to Steward re same	0.1	\$350.00	\$35.00
5/7/2015	DR	11	Prepare for mediation	0.5	\$350.00	\$175.00
5/7/2015	DR	13	Conference call with D. Steward, J. Finberg, & J. Mullan re statistical report; Intra-office conference with J. Lewis re same	0.7	\$350.00	\$245.00
5/7/2015	DR	13	Call from D. Breshears	0.3	\$350.00	\$105.00
5/7/2015	DR	13	Call to A. Burr re DKStats work on case; E-mail to team re same	0.1	\$350.00	\$35.00
5/7/2015	JL	13	Review e-mails with expert	0.1	\$900.00	\$90.00
5/8/2015	DR	11	Travel to and from mediation	1.3	\$350.00	\$455.00
5/8/2015	DR	11	Attend mediation at Littler Mendelson's SF office	10.0	\$350.00	\$3,500.00
5/8/2015	JL	11	Mediation in S.F., including travel time	11.5	\$900.00	\$10,350.00
5/11/2015	DR	11	Telephone call to B. Birch re settlement	0.2	\$350.00	\$70.00
5/11/2015	DR	11	E-mail to T. Jackson re settlement terms; E-mail to C. Worthman re same	0.2	\$350.00	\$70.00
5/11/2015	DR	11	Intra-office conference with C. Worthman re mediation	0.3	\$350.00	\$105.00
5/13/2015	JL	12	Review draft plan of allocation; edit; e-mail re same	0.5	\$900.00	\$450.00
5/13/2015	JL	12	Review and respond to e-mail from one of co-counsel re settlement	0.1	\$900.00	\$90.00
5/13/2015	JL	12	Review e-mails among counsel re settlement; Review new draft of plan of allocation	0.2	\$900.00	\$180.00
5/18/2015	JL	12	Review draft settlement approval orders and make edits thereto	0.5	\$900.00	\$450.00
5/19/2015	JL	12	Review emails Re: settlement	0.1	\$900.00	\$90.00

EXHIBIT C
LEWIS, FEINBERG, LEE & JACKSON, P.C.
Cancilla v. Ecolab

Hours & Fees Per Task Code through 08/20/2015

Date	Atty/	Category	Description	Time	Value	Value
5/19/2015	JL	12	Review draft settlement agreement	0.6	\$900.00	\$540.00
5/19/2015	JL	12	Conference with co-counsel to go over settlement agreement draft	1.0	\$900.00	\$900.00
5/21/2015	JL	12	Review revised draft settlement agreement, orders; Review and respond to e-mails about them	0.7	\$900.00	\$630.00
5/22/2015	JL	12	Telephone call to J. Finberg to discuss settlement agreement issues	0.2	\$900.00	\$180.00
5/26/2015	JL	12	Review emails from cocounsel to opposing counsel re settlement issue	0.1	\$900.00	\$90.00
5/26/2015	JL	12	Review and edit draft class notice	0.6	\$900.00	\$540.00
5/26/2015	JL	12	Review revised draft notice	0.2	\$900.00	\$180.00
5/27/2015	JL	12	Review revised settlement documents; e-mails re same and settlement administrator	0.2	\$900.00	\$180.00
5/27/2015	JL	12	Review and reply to emails regarding settlement provisions and a severance agreement	0.1	\$900.00	\$90.00
5/28/2015	DR	11	E-mail to J. Lewis re class rep contact	0.1	\$350.00	\$35.00
5/28/2015	JL	11	Meeting with co-counsel re contacting named plaintiffs about settlement	0.1	\$900.00	\$90.00
5/29/2015	DR	11	E-mail to J. Lewis re call to class rep	0.1	\$350.00	\$35.00
5/30/2015	JL	12	Review and edit revised notice to class	0.2	\$900.00	\$180.00
6/1/2015	DR	12	Telephone call to R. Birch re general release	0.1	\$350.00	\$35.00
6/1/2015	JL	12	Review numerous emails and redraft of settlement and preliminary approval documents	0.3	\$900.00	\$270.00
6/3/2015	JL	12	Edit Finberg Decl.	0.2	\$900.00	\$180.00
6/4/2015	JL	12	Review revised declaration; Send email re same	0.1	\$900.00	\$90.00
6/4/2015	TJ	12	Review 9th Cir. Fee case, review papers, E-mail to co-counsel re: same	0.5	\$700.00	\$350.00
6/5/2015	DR	12	Send settlement to B. Birch; E-mail to J. Finberg re same	0.1	\$350.00	\$35.00
6/10/2015	JL	12	Review e-mail from co-counsel; review revised declaration	0.2	\$900.00	\$180.00
6/12/2015	JL	12	Edit preliminary approval brief	0.5	\$900.00	\$450.00
6/17/2015	DR	16	Review e-mail from J. Finberg re case schedule; E-mail to J. Lewis & T. Jackson re same	0.1	\$350.00	\$35.00
6/23/2015	DR	12	Meet with J. Lais re: status of preliminary approval work.	0.1	\$350.00	\$35.00
6/23/2015	JLa	12	Meet with D. Ranahan re: status of preliminary approval work.	0.1	\$250.00	\$25.00
8/12/2015	JL	12	Review Court's preliminary approval order	0.2	\$900.00	\$180.00
8/17/2015	DR	12	E-mail to T. Jackson & J. Lewis re final approval	0.2	\$350.00	\$70.00
8/20/2015	DR	12	Conference call re final approval & fees motions	0.4	\$350.00	\$140.00
TOTAL:				466.8		\$178,172.50